		5
1		IN THE UNITED STATES DISTRICT COURT
2		WESTERN DISTRICT OF VIRGINIA
3		ROANOKE DIVISION
4		
5		
6		
7	BRIAN SCOTT DU	inin ,)
		Plaintiff)
8	-vs-) CASE NO.:) 7:14cv00429
9	SHERIFF MORGAN	,
10		Defendant)
11		
12		
13		
14		
15	DEPOSITION OF:	MORGAN MILLIRONS
16		
17	DATE:	APRIL 7, 2015 (Tuesday)
18	TIME:	9:00 a.m.
19	LOCATION:	GUYNN & WADDELL 415 College Avenue
20		Salem, Virginia 24153
21		
22	REPORTER:	Lisa M. Hooker, RPR Registered Professional Reporter #29505
23		
24		
1		

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1	A P P E A R A N C E S	ge 3	1	Page 5 MORGAN MILLIRONS
2	FOR THE PLAINTIFF: STRELKA LAW OFFICE, PC		2	having been sworn by the Registered Professional Reporter,
3	Attorneys at Law 119 Norfolk Avenue, SW		3	Lisa M. Hooker, to tell the truth, the whole truth, and
4	Suite 330			
5	Roanoke, Virginia 24011 (540) 283-0802		4	nothing but the truth, testified as follows:
	(no fax available)		5	
6 7	thomas@strelkalaw.com BY: THOMAS E. STRELKA, ESQ.		6	EXAMINATION BY THOMAS E. STRELKA, ESQ.
8			7	Q. All right, please state your name for the
9	FOR THE DEFENDANT: GUYNN and WADDELL, PC Attorneys at Law		8	Record.
10	415 South College Avenue		9	A. Morgan Millirons.
11	Salem, Virginia 24153		10	Q. Good morning, Mr. Millirons. I identified
	(540) 387-2320		11	myself earlier; I'm Tommy Strelka, counsel for the
12	(540) 389-2350 jim.guynn@gmdlawfirm.com		12	Plaintiff in this action. Just a few thing, basic rules.
13			13	Have you ever been deposed before?
14	BY: JIM H. GUYNN, JR., ESQ.		14	
	ALSO PRESENT: Brian Scott Dunn			A. I was deposed years ago in a civil action.
15 16	EXHIBITS		15	Q. Okay.
17	NUMBER DESCRIPTION PA	AGE	16	A. In a vehicle accident.
18	Exhibit 6 Board of Supervisors Minutes dated 10-2-2013.	102	17	Q. All right, I'm sure that you've testified
19	Exhibit 7 Letter from Sherry Helsel to Mr.	102	18	many times in court?
20	McKlarney dated 5-23-12.	115	19	A. Hoom-hoom.
20	Exhibit 8 Animal Facility Inspection Report dated 5-10-12.	116	20	Q. And so Rule Number 1 is you just answered
21			21	perfectly my question, but you said "hmm-hmm."
22	Exhibit 9 Letter from Mr. Millirons to Mr. McKlarney dated 1-23-13.	117	22	A. Oh, yes, I'm sorry.
	Exhibit 10 Letter from Ms. Helsel to Mr. McKlarney		23	
23	dated 9-30-13. Exhibit 11 Letter from Mr. McKlarney to Ms. Helsel	118		
24		119	24	forward, and I will try to remind you as we progress, but
1			1	

		Morgan Milliron		11 0 1, 0 1, 201	5 Pages 6
1	all reads and note have to be	Page 6	1	Α.	Page 8 He used to work for me.
1 2	all yes's and no's have to be A. Okay.	e yes s and no s.	1 2	Q.	Okay. And do you remember when it was that
3	-	uh-huh; a slight, you know,	3	he began to w	
4	miswording or mis-typing or miswording or mis-typing or mis-typing or mis-typing or mis-typing or miswording or mi		4	A.	Not exactly. I know that it was February
5		round; do you understand that?	5	or March of 20	•
6	A. I understand	-	6	Q.	Okay. And what title did Mr. Dunn have
7		thing is, unlike normal human	7	-	to work with you?
8	_	in a room, a nice room, and if	8	A.	He was a deputy sheriff.
9	we were just talking, we would		9	Q.	Okay. And was he did he remain a deputy
10	other, but she can only type	-	10	-	shout the course of his employment?
11	A. I understand.		11	A.	He was a deputy sheriff, yes.
12			12	Q.	Was he ever given a promotion?
13			13	Α.	He was.
14			14	Q.	And to what was he promoted; what rank was
15	there; do you understand?		15	he promoted to	<u>-</u>
16	A. I understand.		16	A.	He was a sergeant and then he was a first
17			17		then he was a lieutenant.
18	here today; you can take brea		18	Q.	Okay. And are you aware of the date in
19	with your attorney, and I will		19		was terminated from the sheriff's office?
20			20	A.	The exact date?
21	let me go and talk to Jim.		21	Q.	Well, are you aware that it was in 2013?
22	A. I understand t		22	Α.	Yes.
23		nswer the question, and then	23	Q.	Are you aware that it was in October of
24	you can go talk to Jim or go	-	24	2013?	1,10
1	it is.	Page 7	1	Α.	Page 9 Yes.
2	A. Okay.		2	0.	The what I want to know is a little bit
3	•	ow, where are you currently	3	~	e structure of the office and the people that
4	employed, sir?		4	are there, oka	
5		Sheriff's office.	5	Α.	Okay.
6	-	are the Sheriff of Giles	6	Q.	So I want but I want to put it in the
7	County?		7	-	October of 2013.
8	A. Yes, sir.		8	Α.	Okay.
9		have you been a sheriff at	9	Q.	Okay, so at that point in time, how many
		•		~	
ΤU	Giles County?		10	deputies were	
10 11	*		10 11	_	working for the sheriff's office in Giles? I don't know.
11	A. Since January	1, 2008.	11	Α.	working for the sheriff's office in Giles? I don't know.
11 12	A. Since January Q. And that is a	1, 2008. n elected position?	11 12	A. Q.	working for the sheriff's office in Giles?
11	A. Since January Q. And that is at A. Yes, sir.	1, 2008. n elected position?	11	Α.	working for the sheriff's office in Giles? I don't know. Okay.
11 12 13	A. Since January Q. And that is at A. Yes, sir.	1, 2008. n elected position? - have you served one term or	11 12 13	A. Q. A.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that.
11 12 13 14	A. Since January Q. And that is an A. Yes, sir. Q. And is that	1, 2008. n elected position? - have you served one term or	11 12 13 14	A. Q. A. Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten?
11 12 13 14 15	A. Since January Q. And that is an A. Yes, sir. Q. And is that more than one term? A. I am in my sec	1, 2008. n elected position? - have you served one term or cond term.	11 12 13 14 15	A. Q. A. Q. A.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten.
11 12 13 14 15 16	A. Since January Q. And that is an A. Yes, sir. Q. And is that— more than one term? A. I am in my sec Q. In your second	1, 2008. n elected position? have you served one term or cond term. d term, okay, and is it your	11 12 13 14 15 16	A. Q. A. Q. A. Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20?
11 12 13 14 15 16 17	A. Since January Q. And that is an A. Yes, sir. Q. And is that— more than one term? A. I am in my sec Q. In your second	1, 2008. n elected position? - have you served one term or cond term. d term, okay, and is it your riff, you are a constitutional	11 12 13 14 15 16 17	A. Q. A. Q. A. Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20? Probably around 20.
11 12 13 14 15 16 17	A. Since January Q. And that is an A. Yes, sir. Q. And is that more than one term? A. I am in my sec Q. In your second understanding that, as a sher	1, 2008. n elected position? - have you served one term or cond term. d term, okay, and is it your ciff, you are a constitutional ode?	11 12 13 14 15 16 17	A. Q. A. Q. A. Q. A. Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20? Probably around 20. Okay.
11 12 13 14 15 16 17 18	A. Since January Q. And that is an A. Yes, sir. Q. And is that— more than one term? A. I am in my sec Q. In your second understanding that, as a sher officer under the Virginia Co A. Yes.	1, 2008. n elected position? have you served one term or cond term. d term, okay, and is it your ciff, you are a constitutional oxde?	11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A. Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20? Probably around 20. Okay. If you are counting the school resource animal control, it was more than 20.
11 12 13 14 15 16 17 18 19 20	A. Since January Q. And that is an A. Yes, sir. Q. And is that— more than one term? A. I am in my sec Q. In your second understanding that, as a sher officer under the Virginia Co A. Yes.	1, 2008. n elected position? have you served one term or cond term. d term, okay, and is it your ciff, you are a constitutional ode?	11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q. A. officers and a Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20? Probably around 20. Okay. If you are counting the school resource
11 12 13 14 15 16 17 18 19 20 21	A. Since January Q. And that is an A. Yes, sir. Q. And is that more than one term? A. I am in my sec Q. In your second understanding that, as a shed officer under the Virginia Co A. Yes. Q. Okay. Now, an	1, 2008. n elected position? - have you served one term or cond term. d term, okay, and is it your riff, you are a constitutional code? re you do you know the	11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q. A. officers and a Q.	working for the sheriff's office in Giles? I don't know. Okay. I don't know the answer to that. Was it less than ten? No, it was more than ten. Okay, less than 20? Probably around 20. Okay. If you are counting the school resource animal control, it was more than 20. All right, and just prior to his

	Morgan 1	viiiiirons	s on 04/07/2015 Pages 1013
1		Page 10	Page 12
1	working at the sheriff's office?		1 Q. Yes, as far as rank is concerned?
2	A. Yes.		2 A. No.
3	Q. And about how many; do you know?		Q. Okay. And I don't mean it
4	A. Lieutenant Gautier, Lieutenant Thwai		4 A. Well, just ask it.
5	and Lieutenant Hutchinson.		5 Q. Well, I don't mean it in a derogatory way,
6	Q. All right, now, as far as I would	-	6 but the lowest position, I'm not trying to say
7	for lack of a better term, the corporate ladder of		7 A. I understand.
8	sheriff's office?		8 Q is a sergeant?
9	A. Okay.	!	9 A. The lowest rank.
10	Q. As far as the corporate ladder of th	e 10	O Q. What is the lowest rank?
11	sheriff's office is concerned, if I was a lieutenan	t like 1	1 A. Sergeant.
12	Mr. Dunn at that time, would those other lieutenant	s that 1	Q. It is sergeant?
13	you just mentioned be exact peers, lateral peers; i	n other 1	3 A. Yes.
14	words, that they wouldn't be supervisory to Mr. Dun	n or 1	Q. Okay, and the lieutenants have supervisory
15	subordinate to Mr. Dunn?	1!	5 authority over the sergeants; is that right?
16	A. Yes.	10	6 A. Yes.
17	Q. Okay, now, if we're to go one rung u	p on 1	Q. Okay, and by that, let's break that down.
18	that corporate ladder at that time, who is up there	? 1	8 Does a lieutenant have the ability to give a sergeant
19	A. That would have been Captain Joe Sha	nks. 1	9 directions, directives to perform certain tasks?
20	Q. Captain Shanks, and were there any o	ther 2	O A. He does.
21	captains at that time?	2:	Q. Does a lieutenant have the ability to write
22	A. No.	2:	2 up a sergeant for disciplinary violations, violations of
23	Q. Okay. And if we are proceeding up t	hat 2	3 policy?
24	ladder at that time, in October of 2013, who is abo	ve 2	4 A. He does.
1	Captain Shanks?	Page 11	Page 13 Okay. But I don't think that a lieutenant,
2	A. Mike Falls, he was the chief deputy.		2 you know, could fire a sergeant?
3	Q. Chief deputy, okay, and it is my		3 A. No.
4	understanding that he had an accident?		4 Q. All right, and who possesses the authority
5	A. Yes.		5 in October of 2013 at the sheriff's office to fire any
6	Q. All right.		6 person who worked at the sheriff's office?
7	A. He will be here this afternoon. He		7 A. The sheriff.
8	crutches and all that good stuff.		8 Q. Okay. Who does the lieutenant in
9	Q. Okay, not fun. All right, so we hav		9 October of 2013 have the authority to alter or change in
10	Falls, and if I were to proceed up that ladder, who		
11	next above Falls?	15 1	
12	A. That is me.	1:	
13	Q. Okay. Now, going back down the ladd		
14	have the lieutenants again, do in October of 201		• • •
15	anybody you said that excuse me, I'm speaking		
16	gibberish now. Mr. Dunn was promoted to lieutenant		
17	the position of sergeant?	1	
18	A. Yes.	11	
19	Q. Okay, and so in October of 2013, wer		• •
20	other sergeants that were beneath the lieutenants?	21	
21	A. Yes.	2:	• •
22	Q. Okay, were there any other positions		
23	beneath sergeant at that time?	2:	• • •
		1.0	4 7 9 9
24	A. You mean rank.	2	4 A. Stopping cars, you know, looking for

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	Page 14		Page 16
1	drugs. He had a drug dog.	1	a while back for a civil matter. What was that about?
2	Q. Okay, was there any other lieutenant that	2	Was that a lawsuit?
3	was working in his section?	3	A. This was a lawsuit. This was in Blacksburg
4	A. They would occasionally.	4	and I worked a vehicle accident, and a young man tried to
5	Q. Okay.	5	beat a car across the road and got hit.
6	A. On overtime.	6	Q. Okay, so you were essentially a witness for
7	Q. Okay.	7	the in the case at that time?
8	A. Special details.	8	A. Well, I was the investigating officer.
9	Q. All right, I understand.	9	Q. Sure.
10	A. And if they needed help, they would you	10	A. And I had to take the witness statements of
11	know, we are a small department. We did what we had to	11	everyone who saw it.
12	do, and if there was a lieutenant there and we needed him	12	Q. Okay, I understand. All right. We're here
13	to do something, I mean, the lieutenant had to perform his	13	today because of a lawsuit. Have you had the opportunity
14	duties as a deputy sheriff as well.	14	to look or read, I will say read, the Plaintiff's
15	Q. Okay.	15	Complaint that he filed in this case?
16	A. And if the crime scene was being	16	A. I have.
17	investigated and the investigator was there, he pretty	17	Q. Okay. And I'm going to go through a couple
18	much was more or less in charge of the crime scene.	18	of the a number of paragraphs in there, okay, and I'm
19	Q. Okay. And in so you just highlighted	19	going to ask you, after I read it, if you agree with it or
20	what Mr. Dunn his tasks were as a lieutenant. What	20	not.
21	were the other areas that lieutenants worked in in the	21	A. Okay.
22	other divisions or sections, whatever you called it, at	22	Q. And if you don't agree with it, I want you
23	the time in October of 2013?	23	to tell me why you don't agree with it, okay?
24	A. Okay, I had a Lieutenant Eric Thwaites, he	24	A. Okay.
	Page 15		Page 17
1	was over investigations.	1	Q. All right. Let's see. I will read this
2	Q. Okay.	2	because we didn't really talk about this so I'm
3	A. Lieutenant Timmy Hutchinson, he was over	3	interested. This is Paragraph 3 of the Second Amended
4	court security, which is our Number One priority at the	4	Complaint. "At the time that his employment with the
5	sheriff's office.	5	sheriff's office ceased, the Plaintiff worked primarily as
6	Q. Okay.	6	a lieutenant K-9 officer. However, the Plaintiff's job
7	A. He took care of all transport orders. He	7	duties required the wearing of multiple hats;" would you
8	was over civil process, he made sure that the civil papers	8	agree or disagree with that?
9	were kept up to date, he made sure that the jury papers	9	A. I agree.
10	were out, and he made sure that there was enough court	10	Q. We didn't talk about K-9 officers. In
11	security for the courts.	11	October of 2013, do you know how many K-9 officers you
12	Q. Okay.	12	had?
13	A. And sometimes we were running two courts a	13	A. I had one.
14	day, Circuit Court and General District. He had to call	14	Q. Was that just Mr. Dunn?
15	extra people in to make sure that those were covered. We	15	A. Yes.
16	had Lieutenant Gautier and he was over narcotics and he	16	Q. And the simple fact that one is a K-9
17	was also an investigator, and if I needed $\mathop{\hbox{\rm him}}\nolimits$ on the road,	17	officer does not give that officer, that employee, any
18	he also worked the road.	18	additional supervisory authority over anyone in the
19	Q. Okay. And does that cover everybody? Did	19	corporate ladder, does it?
20	we miss anybody there? You said Gautier, Dunn, Thwaites,	20	A. No.
21	and Hutchinson?	21	Q. All right. All right, and so this next
22	A. Hutchinson, yes.	22	paragraph, I kind of list some of the duties that ${\tt Mr.}\ {\tt Dunn}$
23	Q. Okay. All right. And earlier you	23	did.
24	mentioned that you had testified in a deposition earlier,	24	A. Okay.

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	Page		Page 20
1	Q. Okay, and so I'm going to read you some of	1	Q. But why did Mr. Dunn do that; was that part
2	the duties, and then I will say, do you agree, is that	2	of his job?
3	something that he did, and then we'll go to the next one.	3	A. That was part of his job as a supervisor.
4	A. Okay.	4	Q. Did the other lieutenants do that?
5	Q. Paragraph 4, "As an example of a	5	A. Yes, the sergeants did, and
6	nonexhaustive list in the course of his duties in his job		Q. Okay.
7	the Plaintiff, A, headed a drug interdiction program;" do	7	A and if a sergeant saw something that was
8	you agree or disagree?	8	wrong, he fixed it.
9	A. Yes.	9	Q. Okay. So, what you are saying is kind of
10	Q. And B, "Possessed oversight and	10	the oversight of the fleet of vehicles, as far as getting
11	discretionary authority regarding maintenance of a fleet	11	these things to repair shops if they needed it, I mean,
12	of law enforcement vehicles;" do you agree or disagree?	12	that was on an individual basis; no one had to go to Scott
13	A. Him being totally responsible?	13	Dunn to get it done?
14	Q. "Possessed" I will read it again and we	14	A. That's right.
15	can talk more about it.	15	Q. Okay. I will read you this one. "He
16	A. Okay.	16	possessed oversight and discretionary authority regarding
17	Q. Because I want you to see whether you agre		responses to employee grievances." Do you agree or
18	or disagree. "Possessed oversight and discretionary	18	disagree?
19	authority regarding the maintenance of a fleet of law	19	A. Disagree.
20	enforcement vehicles;" do you agree or disagree?	20	Q. Why is that?
21	A. Disagree.	21	A. Because I had the grievances.
22	Q. Okay, why do you disagree?	22	Q. If a let me ask you this. Does the
23	A. Because if we needed something worked on a		sheriff's office have a formal grievance process or
24	the school bus garage, we took it to the school bus garag	24	procedure?
	Page 1	9	Page 21
1	and had it fixed, had it repaired, and I didn't have time	1	A. Not really. If if he wrote if a
2	to wait to go through Scott Dunn to get that finished or	2	sergeant wrote a field deputy up, then it would they
3	fixed.	3	would take care of the problem and it would come on up the
4	Q. Okay.	4	ladder.
5	A. And if he was around, we would tell him,	5	Q. Okay. If let's say that an employee of
6	but if he wasn't around, the guys went ahead and had the	6	the sheriff's office had a complaint about how things were
7	maintenance complete.	7	going; you know, they didn't like something that happened
8	Q. Okay. Where is the school bus repair shop		at work or they didn't like how things were being done,
9	is that at the school?	9	and so how in October of 2013, how would how would a
10	A. That is the County garage at the bottom of	10	sergeant air that complaint? Is there any policy that
11	just 460 West going out of Pearisburg.	11	gives them guidance?
12	Q. Okay, so, and I understand that you are	12	A. They would go to the supervisor.
13	talking about earlier about how you are not a big office	13	Q. That would be the lieutenant?
14	and people have to do the work, essentially, you know,	14	A. That would be the lieutenant. If they
15	things have to get done?	15	weren't happy with the lieutenant, they would go to the
16	A. Yes.	16	next person in charge.
17	Q. But what I want to know is, did you sai		Q. Okay. And so I'm going to read you the
18	that if he was there, you know, an officer might go to	18	next paragraph, the next sentence; this is Letter D as in
19	him, so was he assigned some sort of duty regarding these	19	dog, "Possess supervisory authority over numerous
20	vehicles?	20	employees of the sheriff's department;" do you agree or
21	A. He he looked at the vehicles; he was a	21	disagree?
22	supervisor, and if he saw something wrong with the	22	A. Agree.
23	vehicle, he made a complaint on it. He had the guys go	23	Q. And Paragraph E, "Maintained employees'
24	fix it.	24	schedules and leave requests;" agree or disagree?

		Morgan Milliro	ns (on 04/07/2015 Pages 222
1	7	Page 22	1	Page 2
1 2	A. Q.	Agree. F, "Retained supervisory authority over	1 2	
3	_	ons;" agree or disagree?	3	
4	A.	I would agree.	4	long as it didn't interfere with his duties as a deputy
5	0.	All right. All right, and sitting here	5	sheriff in the Giles County sheriff's office, it would be
6	~	re of course aware that Mr. Dunn is a Board	6	fine.
7		Board of Giles County?	7	Q. Okay. As the Sheriff of Giles County,
8	A.	Yes.	8	you would it be fair to say that you interact
9	0.	Okay. And he was a Board member during the	9	frequently with the Board of Giles County?
10	~	s employment at the sheriff's office, wasn't	10	
11	he, for a tim		11	Q. Are you present at all of the Board
12	A.	Yes.	12	meetings?
13	0.	And when was the first he strike that.	13	A. No.
14	~	when you first learned that Mr. Dunn wished	14	
15	-	at on the Board of Giles County?	15	Board meetings?
16	Α.	No, I don't.	16	A. Yes.
17	Q.	Okay.	17	Q. Okay. All right, and are you familiar with
18	Α.	I remember him coming to me, telling me	18	an animal shelter within Giles County?
19		nterested in running for the Western End	19	A. Yes.
20		the Board of Supervisors, but as far as the	20	Q. And I've always just read it as the Giles
21		e, no, I don't remember that.	21	County Animal Shelter, but does it have a different name
22	Q.	Okay. Was he a lieutenant at that time?	22	other than that?
23	Α.	I don't know.	23	A. If it does, I don't know about it.
24	Q.	Okay.	24	Q. And that shelter is owned by the County of
				D 0
1	A.	Page 23 I think he probably was.	1	Page 25 Giles; is that right?
2	Q.	Where were you when you had this	2	A. I think it is.
3	conversation?		3	Q. Okay, and my understanding of that would be
4	A.	I don't know.	4	that the Board of Giles County would then have authority
5	Q.	Was it was it at the sheriff's office,	5	over the
6	but you just	don't know where?	6	A. Yes.
7	A.	I'm not sure. It could have been in a	7	Q. Okay. But would you agree with me that the
8	parking lot f	or all I know.	8	Board has the authority to assign or well, strike
9	Q.	It could have been over the phone?	9	that. At some point the sheriff's office took control of
10	A.	It could have been over the phone or on the	10	the management of the Giles County Animal Shelter; is that
11	side of the r	road somewhere; I don't know.	11	right?
12	Q.	Okay, I will read you this paragraph and	12	A. They did.
13	you let me kn	ow if you agree or disagree. Next Paragraph,	13	Q. And was that before you were elected
14	"Prior to run	ning for the aforementioned elected seat,"	14	sheriff?
15	and in the pr	revious paragraph they talk about how he ran	15	A. Yes.
16	for the seat	of the Board, "the Plaintiff sought	16	Q. And so when you were elected sheriff, that
17	permission fr	om Sheriff Millirons;" do you agree or	17	was kind of the status quo, was that the sheriff's office
18	disagree?		18	was in charge of running the Giles County Animal Shelter?
19	A.	I agree.	19	A. Yes.
20	Q.	And you gave him that permission?	20	Q. Okay. And does the sheriff's office today
21	A.	Yes.	21	manage the Giles County Animal Shelter?
22	Q.	And did you have any more detailed	22	A. No.
23		out your roles, you know, his role, your	23	Q. And it is my understanding that the who
24	role, to move	e forward? Go ahead.	24	manages it now?
1			1	

Pages 26..29

	Morgan Milliro	ns (on 04/07/2015 Pages 2629
_	Page 26	1	Page 28
1	A. Giles County.	1	salary came from where?
2	Q. Okay.	2	A. I guess the Board of Supervisors.
3	A. I don't know the person that is over it,	3	Q. Okay. And okay, but the sheriff's
4	the individual, but I know that I inherited it.	4 5	office didn't pay Ms. Perkins directly?
5	Q. I understand. During your oversight of the	6	A. No. O. How did that work?
7	animal shelter, the animal shelter how many how many	7	~
8	employees staff the animal shelter? A. Just one.	8	A. I would get an invoice from Greenbrier Contracting, and that is owned by Dave Hunt from Newport,
9	Q. And who was that?	9	Virginia.
10	A. That was Chastity Dalton Perkins.	10	Q. Okay.
11	Q. Okay, and what are her general duties?	11	A. And he would give me a statement for a
12	A. She cleaned and fed the animals.	12	monthly bill. He was supposed to give me a statement for
13	Q. And you've been inside of the animal	13	a monthly bill. Sometimes he would wait three or four
14	shelter?	14	months before he would give me a statement. He would just
15	A. Yes, I have.	15	get behind and then he would send three or four months at
16	Q. And I've not; I've seen some pictures, but	16	one time, and, you know, they would pay him.
17	can you describe it briefly for the Record, what it looks	17	Q. All right.
18	like inside? Is it just like cages?	18	A. Then I guess that he would pay her.
19	A. Well, what do you call them, kennels or	19	Q. Would the bills excuse me, the invoices
20	runs. They are metal, concrete floor, painted, and that	20	from Greenbrier Services, the staffing company, would they
21	is in the I don't know how many there is, maybe ten or	21	come from your office or go directly to the County?
22	twelve. It may not be that many, but there is a cat room	22	A. I don't know if they would go to the County
23	with the cat cages in it as well, and the kennels are	23	first or if they would come to my office first.
24	concrete and there is drains in them.	24	Q. Okay.
			<u>v</u>
1	Page 27 Q. Okay. One of the functions of the animal	1	Page 29 A. I know that I would sign off on them when
2	shelter is to provide adoption services for	2	we got them, you know, when it was time for them to be
3	A. Yes.	3	paid. I don't know about if they sent them to the County
4	Q. Okay, however, during the time in which the	4	administrator's office first.
5	sheriff's office managed the shelter, at times, animals	5	Q. All right. Excuse me just one second. Are
6	would have to be euthanized; is that right?	6	you aware of how much Ms. Perkins was paid?
7	A. That's right.	7	A. I'm not sure. I think \$7.50 an hour, six
8	Q. And that could be either due to health	8	hours a day, seven days a week, I believe.
9	reasons or perhaps overcrowding; would that be right?	9	Q. Okay. And the way it worked at the
10	A. Yes.	10	staffing company, the bill would be a little higher for
11	Q. And do you know when the sheriff's office	11	the staffing company for the hourly rate, and then
12	was in charge of the animal shelter whether or not there	12	because the staffing company needs to take their cut,
13	was a policy in place by which if an animal had been at	13	right?
14	the shelter for a certain amount of time, then that animal	14	A. I guess.
15	would be euthanized?	15	Q. So is it your understanding that Ms.
16	A. No.	16	Perkins was an hourly employee?
17	Q. Okay. So no policy like that existed?	17	A. She was a contract employee, six hours a
18	A. If it did, I don't know about it.	18	day, seven days a week, according to Mr. Hunt.
19	Q. Okay. When you were when the sheriff's	19	Q. Okay.
20	office when you were sheriff, assuming you are sheriff,	20	A. And that was set up by a former animal
21	did you have a policy book or manual that illustrated how	21	control officer, William Clemons, we all know him as Buck
22	the animal shelter should be operated?	22	Clemons, and he said that he could not go out and clean
23	A. No.	23	the kennels and feed the dogs and pick up animals, you
24	Q. And the funds to pay for Ms. Perkins'	24	know, during his routine patrols. He was spending too
	2		and spending too

	wiorgan willing	115 (on 04/07/2015 Pages 3033
1	Page 30	1	Page 32
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	much time at the shelter, and he needed some help and they hired her to do that. I think that it was 2005 or 2006; I	1 2	A. I think she probably did, the last little bit of time that she was employed. I'm thinking that; I
3	don't know exactly.	3	don't know exactly.
4	Q. So that was all before you became sheriff?	4	Q. Okay, so it is your understanding that, the
5	A. Yes.	5	majority of the time that she was employed working at the
6	Q. All right. So it is your understanding	6	shelter, she did not clock in or clock out?
7	that Ms. Perkins was an hourly employee, not a salaried	7	A. No.
8	employee, and by that I mean she got paid for the hours	8	Q. Okay.
9	she worked, and it wasn't like she got a guaranteed amount	9	(The Court Reporter read back the preceding
10	and she could choose however many hours she wanted to	10	question.)
11	work, right? It is my understanding that you are telling	11	BY MR. STRELKA:
12	me that she was an hourly employee; would you agree with	12	Q. Is this a truthful statement, that for the
13	that?	13	majority of the time that Ms. Perkins worked at the
14	A. No.	14	shelter, she did not clock in or clock out; is that a
15	Q. No?	15	truthful statement?
16	A. No. It was I asked Dave Hunt, the owner	16	A. That is a truthful statement.
17	of Greenbrier Contracting, and I said, is she supposed to	17	MR. GUYNN: Thanks. That was going to be a
18	be working six hours a day, and he said, Morgan, it was	18	problem when we read the transcript.
19	set up, if she worked two hours a day, if she worked six	19	MR. STRELKA: No, no, that is a good eye.
20	hours a day, she got paid six hours a day, seven days a	20	BY MR. STRELKA:
21	week.	21	Q. All right. Was there anyone at the
22	Q. When did you have this conversation with	22	sheriff's office who exercised any supervisory authority
23	Buck, this conversation	23	over Ms. Perkins?
24	MR. GUYNN: Hunt.	24	A. The animal control officer.
	Dogo 21		Dogg 22
1	Page 31 THE WITNESS: Dave Hunt.	1	Q. Okay. And how many, and let's say in
2	BY MR. STRELKA:	2	October of 2013, how many animal control officers were
3	Q. Pardon me, thank you.	3	there?
4	A. I'm not exactly sure, but he wrote a letter	4	A. We had one full-time animal control officer
5	for me during that time and he told me, he said, that is	5	that was Jeff Spicer.
6	the way that they set it up with Buck Clemons. He said	6	Q. Okay. And in October of 2013, do you know
7	because sometimes, you know, she didn't need to be out	7	if he was a sergeant or a lieutenant or just
8	there six hours a day and sometimes she could get the work	8	A. He is just an animal control officer.
9	done in two hours, maybe an hour, but he said she got paid	9	Q. So he was a separate
10	six hours a day, seven days a week.	10	A. He was a deputy sheriff.
11	Q. Okay. And so from this conversation, would	11	Q. Okay.
12	it be fair to say that well, strike that. So would it	12	A. They were under the sheriff's office.
13	be fair to say that during the course of her employment,	13	Q. All right, and so let's put him in that
14	Ms. Perkins, that you didn't know exactly how many hours	14	corporate ladder, okay. In October of 2013, would a
15	she was working at the sheriff's at the shelter?	15	lieutenant like Mr. Dunn have supervisory authority over
16	A. I did not.	16	the animal control officer?
17	Q. Okay. Is there a clock at the shelter?	17	A. If he was he was not considered a
18	A. There is now, I think.	18	fieldman but he was a deputy sheriff.
19	Q. Okay. But during the time when the	19	Q. So under the rank and file system then in
20	sheriff's office oversaw the shelter, there was no clock?	20	place, he would have been beneath Mr. Dunn as a when
21	A. There was a clock before I, you know, let	21	Mr. Dunn was a lieutenant; is that right?
22	the County have it.	22	A. He could have been, if he he would have
23	Q. Did Ms. Perkins ever punch in and out like	23	been if he needed him for animal control.
24	on a time card when she got to work?	24	Q. Okay.
1		1	

	Widigan Winni		on 04/07/2013 1 ages 343/
1	Page 34 A. He he did not handle any law enforcement	1	Page 36 paid?
2	issues. He only handled animal control issues.	2	A. The Board of Supervisors.
3	Q. Okay, but Mr. Dunn could call him and give	3	Q. Okay. During Ms. Perkins' employment at
4	him directions and order him to do tasks?	4	the animal shelter, did you ever write her up for any
5	A. Yes, if it had to do with animal control.	5	policy violation?
6	Q. Okay. And just to kind of flesh this out,	6	A. No.
7	Jeff Spicer could not call Lieutenant Dunn and give him	7	Q. All right.
8	directives and tell him what to do, could he?	8	A. Not that I know of.
9	A. No.	9	Q. Okay, would you have had the authority to
10	Q. All right, so could you describe just	10	do so?
11	flesh this out for me I guess is a good term to use, if	11	A. I would have.
12	you can, the relationship between the animal control	12	Q. Okay. Does Ms. Perkins have a personnel
13	officer and the employee at the shelter. I mean, you said	13	file that is at the sheriff's office at the time that she
14	that the animal control officer has some sort of	14	was working there?
15	authority, I believe, you said over Chastity Perkins when	15	A. No.
16	she worked at the shelter; is that right?	16	Q. Are documents related to the animal shelter
17	A. He would come in, and if something needed	17	maintained, records, at the sheriff's office?
18	to be done	18	A. No, they are at the animal shelter.
19	Q. Can you give me an example?	19	Q. Okay.
20	A. If the animals needed to be looked after or	20	A. And at the County Admin.
21	something of that sort, he would tell her and she would	21	Q. You said earlier that you signed off on Ms.
22	get it done.	22	Perkins' time sheets?
23	Q. Okay.	23	A. No.
24	A. If there was one that needed special care,	24	Q. No?
1	Page 35 and if, you know, he would say, you know, this animal here	1	Page 37 A. No, I said that I signed off on invoices.
2	is sickly, you know, you may want to keep an eye on it and	2	Q. Sorry, on invoices, from Greenbrier
3	help me out with this, she would do that, and if and	3	Services
4	there had been times when she would call me and say, I've	4	A. Yes.
5	got one sick, can I take it to the vet.	5	Q that pay her?
6	Q. Okay.	6	A. Yes.
7	A. You know, we need to get this animal looked	7	Q. Okay, and when you are presented the
8	at.	8	invoice, do you have are you ever presented with an
9	Q. All right.	9	allocation of the hours that Ms. Perkins has worked?
10	A. They kind of worked together.	10	A. No.
11	Q. Okay. Was there any other employee of the	11	Q. Okay. So you just get the bill and you pay
12	sheriff's office who exercised authority other than this	12	the bill; is that what you are saying?
13	animal control officer over this worker, Ms. Perkins?	13	A. Yes.
14	A. I would I would imagine if I wasn't	14	Q. Okay, does the bill
15	there, you know, the supervisor that was there, either the	15	MR. GUYNN: I think he said that he sends
16	major or the captain, you know, if I wasn't available.	16	the bills to the Board of Supervisors to be paid.
17	Q. Okay. And so what you are saying is the	17	BY MR. STRELKA:
18	corporate hierarchy, or for lack of a better term,	18	Q. All right, so you process the bill to the
19	corporate ladder, for lack of a better term, the ranking	19	Board of Supervisors where it's then paid?
20	system, rank and file?	20	A. Yes.
21	A. Okay.	21	Q. Okay. And have you ever disputed an amount
22	Q. Was such that well, how should I word	22	that was on that invoice with Greenbrier Services?
23	this. I'm going to strike all of that nonsense. Who	23	A. No.
24	determines how much money Ms. Perkins is going to get	24	Q. All right.
			zj

		1,201 Bwar 1,211111)n U4/U//2U15	Pages 3841
1	7\	Page 38 I I did one time, because I had to call	1	officer?	Page 40
2	A.	them that I had not received a bill.	2	A. He was.	
					ad to Mr. Davidston
3	Q.	Okay.	3	~	ed to Ms. Perkins?
4	Α.	And it was like for the month of January	4	A. He is her f	
5		nim back and I told the secretary, I said, we	5		re of an entity called Giles
6		ived a bill from like September through	6	Animal Rescue, formally Gi	les County Animal Rescue?
7	December.		7	A. I am.	
8	Q.	Okay.	8		your what do you know about
9	Α.	To that effect, and he checked his records	9	them?	
10		bill in for that.	10		w a whole lot.
11	Q.	Okay. Okay.	11	Q. Okay.	
12	A.	But as far as they have all been the	12		on't know if this is the group
13	same.		13		oblems at the shelter, but they
14	Q.	Do you physically sign the invoices before	14	wanted to participate and	I agreed, and I had things
15	you send them	to the County?	15	missing, water buckets, do	g leads, things like that. The
16	A.	Yes.	16	office was broke into whil	e Chastity wasn't there, nor was
17	Q.	All right. And so the funds, like you	17	Melvin or the other part-t	ime animal control officer, and
18	testified, th	e funds that paid for Ms. Perkins are	18	I stopped it all.	
19	allocated by	the County?	19	Q. Okay. All	right, and let's let me just
20	A.	Yes, the Board of Supervisors.	20	go back to what you said.	You said the other part-time
21	Q.	Okay, and the funds to pay for the animal	21	animal control officer?	
22	control offic	er are from the County as well?	22	A. Yes.	
23	A.	Yes.	23	Q. Who was tha	t?
24	Q.	Okay. I'm going to read you this paragraph	24	A. That would	have probably been Frank Gough
-		Page 39	-		Page 41
1	from the Comp	laint and you tell me if you agree or	1	at the time.	1 ugc 41
2	disagree.		2	Q. Okay, so yo	u had a during the period of
3	A.	Okay.	3	time in which the sheriff'	s office was in charge of the
4	Q.	Paragraph 15, "At all times pertinent to	4	shelter, at the shelter, y	ou've got Chastity Perkins, but
5	this Complain	t, the sheriff's department was allocated	5	you've also got a full-tim	e animal control officer?
6	funds specifi	cally for the hiring of two full-time animal	6	A. Yes.	
7	control emplo	yees to staff the shelter;" is that a	7	Q. And you hav	e a part-time animal control
8	truthful stat	e or not?	8	officer?	
9	A.	Read it again.	9	A. Yes.	
10	0				
10	Q.	Again, okay. "At all times pertinent to	10	Q. And didn't	that part-time animal control
10		Again, okay. "At all times pertinent to t, the sheriff's department was allocated	10 11		that part-time animal control ssues; wasn't he out of work for
	this complain		l		ssues; wasn't he out of work for
11	this complain funds specifi	t, the sheriff's department was allocated	11	officer have some health i	ssues; wasn't he out of work for
11 12 13	this complain funds specifi	t, the sheriff's department was allocated cally for the hiring of two full-time animal	11 12	officer have some health i a period of time? Maybe i A. No.	ssues; wasn't he out of work for
11 12 13 14	this complain funds specifi control emplo A.	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter."	11 12 13 14	officer have some health i a period of time? Maybe i A. No.	ssues; wasn't he out of work for
11 12 13 14 15	this complain funds specifi control emplo A. Q.	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why	11 12 13 14 15	officer have some health i a period of time? Maybe i A. No. Q. No? A. No.	ssues; wasn't he out of work for t wasn't health issues.
11 12 13 14 15 16	this complain funds specifi control emplo A. Q. do you disagr	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why see?	11 12 13 14 15 16	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen	ssues; wasn't he out of work for t wasn't health issues.
11 12 13 14 15 16 17	this complain funds specifi control emplo A. Q. do you disagr A.	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why	11 12 13 14 15 16 17	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par	ssues; wasn't he out of work for t wasn't health issues.
11 12 13 14 15 16 17 18	this complain funds specifi control emplo A. Q. do you disagr A. the shelter.	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why ee? The animal control officers did not staff	11 12 13 14 15 16 17 18	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work?	ssues; wasn't he out of work for t wasn't health issues. tly did the part-time, you know, t-time animal control officer
11 12 13 14 15 16 17 18	this complain funds specifi control emplo A. Q. do you disagr A. the shelter. Q.	t, the sheriff's department was allocated cally for the hiring of two full-time animal wees to staff the shelter." No. Okay, and why is that not truthful or why see? The animal control officers did not staff Okay.	11 12 13 14 15 16 17 18 19	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work? A. He would pr	ssues; wasn't he out of work for t wasn't health issues.
11 12 13 14 15 16 17 18 19 20	this complain funds specifi control emplo A. Q. do you disagr A. the shelter. Q. A.	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why ee? The animal control officers did not staff Okay. The animal control officers were put out	11 12 13 14 15 16 17 18 19 20	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work? A. He would pr days a week.	ssues; wasn't he out of work for t wasn't health issues. tly did the part-time, you know, t-time animal control officer
11 12 13 14 15 16 17 18 19 20 21	this complain funds specifi control emplo A. Q. do you disagr A. the shelter. Q. A. there to pick	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why ee? The animal control officers did not staff Okay. The animal control officers were put out up, you know, unwanted animals, domesticated	11 12 13 14 15 16 17 18 19 20 21	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work? A. He would pr days a week. Q. Okay.	ssues; wasn't he out of work for t wasn't health issues. tly did the part-time, you know, t-time animal control officer obably have worked three or four
11 12 13 14 15 16 17 18 19 20 21 22	this complain funds specific control emplor A. Q. do you disagr A. the shelter. Q. A. there to pick animals. The	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why ee? The animal control officers did not staff Okay. The animal control officers were put out up, you know, unwanted animals, domesticated y hired Chastity to staff the shelter,	11 12 13 14 15 16 17 18 19 20 21 22	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work? A. He would pr days a week. Q. Okay. A. Then he wou	ssues; wasn't he out of work for t wasn't health issues. Itly did the part-time, you know, t-time animal control officer Obably have worked three or four
11 12 13 14 15 16 17 18 19 20 21	this complain funds specific control emplor A. Q. do you disagr A. the shelter. Q. A. there to pick animals. The	t, the sheriff's department was allocated cally for the hiring of two full-time animal yees to staff the shelter." No. Okay, and why is that not truthful or why ee? The animal control officers did not staff Okay. The animal control officers were put out up, you know, unwanted animals, domesticated	11 12 13 14 15 16 17 18 19 20 21	officer have some health i a period of time? Maybe i A. No. Q. No? A. No. Q. How frequen per week, roughly, the par work? A. He would pr days a week. Q. Okay. A. Then he wou vacation for two or three	ssues; wasn't he out of work for t wasn't health issues. Itly did the part-time, you know, t-time animal control officer Obably have worked three or four

	Morgan Milliron	13 0	II V4/V// <i>2</i> V1.	5 Pages 4245
	Page 42			Page 44
-			~	So the increase in frequency of volunteers
•	ed vacation for two			's excuse me, at the shelter, that
			`	g your tenure as Sheriff?
				Yes.
	at?		~	Did the sheriff's office implement any
			_	r policies regarding these shelter
-	,		volunteers?	
anyone, outside of working in France,	taking three-month	8		When just before I took I let it go
				unty, we were going to make a policy on an
A. If if something wou	ld come up and we 1	10	age requirement	t. I don't think we ever made that.
•	-	11	Q.	Okay. Okay. Were volunteers able to
in, would take his vehicle and pick u	p an animal. 1	12	access the she	lter and the animals within if Ms. Perkins
Q. Okay.	1	13	was not at the	shelter?
A. And we always okayed t	hat month or months 1	14	A.	Yes, there was a key in this dispatch.
ourselves before he would take off.	1	15	Q.	And where is dispatch?
Q. Okay. All right, now,	let's go back to	16	A.	That is it is at the intersection of
that. I asked a question about Giles	Animal Rescue. 1	17	Curve Road and	Mountain Lake Road. It is just a block and
Let's go back to volunteers. All rig	ht, during the period 1	18	a-half away fro	om the sheriff's office; it is the old
of time in which the sheriff's office	was managing the 1	19	ambulance build	ding, because that is where we had to put
shelter, did volunteers perform any s	ervices at the 2	20	the 911 commun	ication system in because we didn't have
shelter?	2	21	enough room at	the sheriff's office at the time.
A. They would come in and	, you know, walk the 2	22	Q.	When was the decision made to put that key
dogs; some would help clean, some wou	ld help feed.	23	there?	
Q. Okay. Do you have any	idea of how many 2	24	A.	I think that it was there before I ever
	Page 43			Page 45
volunteers, how many people, did this	9	1	took over.	Tage 10
charge of the shelter?		2	Q.	Okay. And if I was a volunteer at that
A. Not really.		3	time, let's say	y in October of 2013 well, before then,
Q. Okay.		4	let's say if I	was a volunteer, how would I access that
A. It started out with tw	o or three and, you	5	key? How would	d I get that key?
know, that was fine.		6	A.	You would go to the sheriff's office and
Q. Okay.		7	pick it up.	
A. I went by one day and	I saw eight or ten	8	Q.	And there would be an employee at the
cars out there. They weren't doing a	nything. They were	9	sheriff's offic	ce, I would tell them who I was, and they
just hanging around. It had become a	hangout for college 1	10	would give it	to me?
kids.	1	11	A.	Yes.
Q. So a number of volunte	ers were from 1	12	Q.	So it wasn't in like a lock box with a
Virginia Tech; is that right?	1	13	combination that	at somebody would drive up and take it?
A. I don't know if they w	ere from Virginia 1	14	A.	No, the dispatcher had to give it to you.
Tech or Radford University.		15	Q.	And the dispatcher was an employee of the
Q. Okay. All right. Whe	n you became when 1	16	sheriff's offic	ce?
you first became sheriff of Giles Cou	nty, had volunteers 1	17	A.	Yes.
to your knowledge ever performed serv		18	Q.	And there was just that one key?
=		19	Α.	It was supposed to be one key.
office before?				
	one.	20	Q.	Okay.
		20 21	Q. A.	Okay. And there were multiple keys after that.
A. No. Well, I did have	2			
A. No. Well, I did have Q. Okay.	2 2	21	Α.	And there were multiple keys after that.
	Q. Okay. So he was allow to three months? A. He was. Q. And did you approve the A. I did. Q. And did I mean, I've anyone, outside of working in France, vacations? I mean A. If if something wou would need him, need somebody, somebod in, would take his vehicle and pick up Q. Okay. A. And we always okayed the ourselves before he would take off. Q. Okay. All right, now, that. I asked a question about Giles Let's go back to volunteers. All right of time in which the sheriff's office shelter, did volunteers perform any sushelter? A. They would come in and dogs; some would help clean, some would object the shelter? A. Not really. Q. Okay. Do you have any volunteers, how many people, did this charge of the shelter? A. Not really. Q. Okay. A. It started out with two know, that was fine. Q. Okay. A. I went by one day and a cars out there. They weren't doing and just hanging around. It had become a kids. Q. So a number of volunteer virginia Tech; is that right? A. I don't know if they we the they were they was a fine. Q. Okay. All right. When they were they was a fine to the property of the company of they weren't doing and the cars out there. They weren't doing and the cars out there. They weren't doing and the cars out there they weren't doing and the cars out there. They weren't doing and the cars out there. They weren't doing and the cars out there they weren't doing and the cars out there. They weren't doing and the cars out there. They weren't doing and the cars out there they weren't doing and the cars out there. They weren't doing and the cars out the ca	A. He doesn't have any health issues. Q. Okay. So he was allowed vacation for two to three months? A. He was. Q. And did you approve that? A. I did. Q. And did I mean, I've just never heard of anyone, outside of working in France, taking three-month vacations? I mean A. If if something would come up and we would need him, need somebody, somebody else would fill in, would take his vehicle and pick up an animal. Q. Okay. A. And we always okayed that month or months ourselves before he would take off. Q. Okay. All right, now, let's go back to that. I asked a question about Giles Animal Rescue. Let's go back to volunteers. All right, during the period of time in which the sheriff's office was managing the shelter, did volunteers perform any services at the shelter? A. They would come in and, you know, walk the dogs; some would help clean, some would help feed. Q. Okay. Do you have any idea of how many Page 43 volunteers, how many people, did this while you were in charge of the shelter? A. Not really. Q. Okay. A. It started out with two or three and, you know, that was fine. Q. Okay. A. I went by one day and I saw eight or ten cars out there. They weren't doing anything. They were just hanging around. It had become a hangout for college kids. Q. So a number of volunteers were from Virginia Tech; is that right? A. I don't know if they were from Virginia Tech or Radford University. Q. Okay. All right. When you became when	A. He doesn't have any health issues. Q. Okay. So he was allowed vacation for two to three months? A. He was. Q. And did you approve that? A. I did. Q. And did I mean, I've just never heard of anyone, outside of working in France, taking three-month vacations? I mean A. If if something would come up and we would need him, need somebody, somebody else would fill in, would take his vehicle and pick up an animal. Q. Okay. A. And we always okayed that month or months ourselves before he would take off. Q. Okay. All right, now, let's go back to that. I asked a question about Giles Animal Rescue. Let's go back to volunteers. All right, during the period of time in which the sheriff's office was managing the shelter, did volunteers perform any services at the shelter? A. 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		Morgan Milliro	115	on 04/07/2015 Pages 4649
		Page 46		Page 48
1	_	ution, other keys were made?	1	streets, it would have been bad, and we were lucky that
2	Α.	Yes.	2	nothing like that disappeared, and there was no money
3	Q.	So it is your belief that volunteers were	3	there because the money was kept at the treasurer's
4	making these k		4	office. You know, if a civilian or citizen wanted to come
5	Α.	Yes.	5	in and adopt a dog, they made a deposit and it was taken
6	Q.	Do you know if Ms. Perkins ever made any	6	to the treasurer's office. Once they went and had it
7	copies of the	•	7	spayed or neutered, they brought the paperwork back and
8	Α.	No, I don't.	8	the treasurer's office would give them a refund on their
9	Q.	Did you ever ask her?	9	deposit. We didn't ever have any money that disappeared.
10	Α.	I did.	10	The paperwork was shuffled, and the equipment was missing
11	Q.	And what did she say?	11	out there.
12	Α.	She told me she didn't know where the keys	12	Q. So this office, is that within the shelter?
13	came from.	The life of the state of the state of	13	A. Yes, yes, sir.
14	Q.	What kind of you started to talk about	14	Q. And that office has its own lock?
15		d problems that you were having with	15	A. It does.
16	volunteers?	The book	16	Q. And the volunteers didn't have a key to
17	Α.	Hmm-hmm.	17	that lock, did they?
18	Q.	Let's go through that.	18	A. No.
19	Α.	Okay.	19	Q. Not as far as you knew?
20	Q.	What kind of problems were they giving you?	20	A. Not as far as I know.
21	A.	I was missing equipment at the well, I	21	Q. Okay. And so the so I just want to make
22	_	g it. There was equipment disappearing at	22	sure, from what you are aware of, it didn't appear as if the exterior of the shelter had been broken into?
23	the shelter.	Ohana Bard hana lakka maka khak IIIni	23	
24	Q.	Okay. And how let's go to that. How	24	A. No, the exterior of the shelter never was
		Page 47		Page 49
1	=	were you aware of that?	1	brought to my attention of being disturbed with the locks
2	Α.	Chastity told me.	2	or the doors or anything. It was the office door inside.
3	Q.	Okay. And what equipment was taken?	3	Q. Okay. Now, do you know around when this
4	Α.	There were feed buckets, water buckets	4	was?
5		leads. Of course, if you have an animal	5	A. No.
6	_	re going to lose dog leads, but when you	6	Q. Okay. All right. Did Ms. Perkins work on
7		leight on a weekend, and, you know, you just	7	the weekends?
8		ring dog leads. That went on for a period of	8	A. She did.
9		puckets were put in on Friday, you would come	9	Q. Were you ever made aware of Ms. Perkins
10	-	morning and they were gone. Feed pans were	10	taking any items herself from the shelter improperly?
11	_	they would put some type of bedding or a mat	11	A. No.
12	_	will come back and they will be gone.	12	Q. All right.
13	Q.	Okay.	13	A. I was it was brought to my attention by
14	Α.	You know, I didn't know who was doing it,	14	somebody that said that she was carrying dog food out, and
15		know, we tried to find out, we could not	15	I questioned her about it and she said yes, and she said,
16		sometimes it would correct itself, but, you	16	we can't keep it there but so many days at a time, because
17	_	had things that would disappear, the door	17	she said that it gets worms in it, and what they used to
18		was broke into.	18	do, they would go out behind the shelter and dump it over
19	Q.	How do you know that?	19	the bank, an embankment, but the bears found it, and the
20	A.	Melvin Dalton came and told me. The office	20	coons and the possums, they found out about it and they
21		en into. Papers were gone through. We were	21	figured out that there was food there, so they would take
22		vere the drug that was used to euthanize	22	it to a dumpster.
23		s in there. That didn't need to be	23	Q. All right.
24	disturbed, or	if that would have gotten out on the	24	A. All of our food is donated to us.
			1	

	Willigan Willin	ons ()11 04/07/2013 1 ages 3033
1	Q. Okay. So during the course of time in	1	Page 52 Q. All right, were you ever made aware of any
2	which the sheriff's office was overseeing the shelter, is	2	conditions in which the food was being kept under lock?
3	it your testimony that the shelter never took possession	3	A. Yes.
4	of money that was intended to be returned to new pet	4	Q. Okay. And how do you how were you made
5	owners?	5	aware of that?
6	A. We did.	6	A. Melvin told me about it.
7	Q. Okay.	7	Q. What did he say?
8	A. At one time, when I first took over as	8	A. He told me that they put a lock on the feed
9	sheriff and Melvin Dalton was doing his thing, you know,	9	room because they would feed the animals.
10	picking up animals, Chastity was doing her thing, if you	10	Q. Who is "they"?
11	wanted to come and adopt a pet, you would pay whatever the	11	A. Chastity or the volunteer, whoever the
12	deposit was, and once you got your paperwork showing that	12	volunteer was, Marilyn Hollie or himself or Frank Gough or
13	the animal had been spayed or neutered, you would come	13	whoever was out there, and the volunteers would come in
14	back and they would give you your money back. We had an	14	and feed them again.
15	audit, and we didn't get written up for it, but the	15	Q. Okay.
16	auditor said that can't go on, because you need to have a	16	A. They were feeding them too much.
17	record of any transaction, and this is what you need to	17	Q. Okay. Was there any other reason that Mr.
18	do, and told us that we needed to turn this over to the	18	Dalton gave you for why he put a lock on the door?
19	treasurer of the Giles County, and then once the procedure	19	A. No.
20	was complete on the dog or the cat, they could go back	20	Q. Do you recall anyone else not anyone
21	with their paperwork and the treasurer could reimburse the	21	else, but do you recall anyone ever complaining about that
22	individual.	22	specific issue?
23	Q. Okay.	23	A. No.
24	A. And that is the way that it's been done	24	Q. All right.
	D 5'		Page 52
1	Page 5	1	Page 53 A. There could have been, but I don't recall.
2	Q. Okay.	2	Q. Under your understanding, who had at that
3	A. I don't know when that was or but it was	3	time the key or keys to be able to access the food room?
4	after 2008.	4	A. It would have been probably Chastity and
5	Q. Okay. All right, and I'm going to read you	5	Melvin Dalton and possibly Marilyn Hollie.
6	just a part of a paragraph, part of a sentence, and I just	6	Q. Okay. Were you ever made aware that Ms.
7	want you to tell me if you agree or disagree with it,	7	Perkins was driving to and from the shelter in a patrol
8	okay?	8	vehicle?
9	A. Okay.	9	A. No.
10	Q. "In early 2013, Ms. Perkins and Mr. Dalton	10	Q. Does the sheriff's department use vehicles
11	began storing animal food in a locked storage container,"	11	as part of the duties of the sheriff's office, undertaking
12	and that would be at the shelter. Do you agree or	12	the duties of the sheriff's office?
13	disagree with that? "In early 2013, Ms. Perkins and Mr.	13	A. Yes.
14	Dalton began storing animal food in a locked storage	14	Q. And who owns those vehicles?
15	container"?	15	A. The Board of Supervisors.
16	A. I don't	16	Q. So the County?
17	Q. You don't know?	17	A. Yes.
18	A. No, I don't know anything about that.	18	Q. Okay. And is it your understanding that
19	Q. Okay. Do you know where the when Ms.	19	the that it was provided for use by the sheriff's
20	Perkins was working there, do you know where she stored	20	department, is that right, by the County?
21	the food?	21	A. Yes, yes.
22	A. It was in a room.	22	Q. All right.
1 00	Q. All right.	23	A. We also let other County agents have our
23	Q. All light.		A. We also let other county agents have our
23	A. I don't know exactly where it was at.	24	vehicles if they needed one.

	Morgan Millir	ons e	on 04/07/2015 Pages 545/
1	Page 5		Page 56
1 2	Q. Okay. Are let's talk just briefly about vehicles. Are employees of the sheriff's office allocated		A. Yes, that's right. Q. What led you to that decision?
3	a specifically vehicle for their individual use, in other	3	A. Equipment walking off.
	words, Lieutenant Dunn, this is your vehicle. Lieutenant	4	
5	Gautier, this is your vehicle, or are vehicles shared?	5	Q. Okay. A. Or equipment leaving the shelter and the
6	A. They are assigned vehicles. It is their	6	door being opened to the office.
7	responsibility. If someone needs a vehicle, I mean, I've	7	Q. Okay. So things you testified about
8	thrown them the keys to the vehicle that I drive and said,		earlier?
9	here, take this one, and they've done me the same way.	9	A. Yes.
10	Q. Are employees of the sheriff's office	10	Q. And anything in addition to what you
11	allowed to use these vehicles for personal use?	11	testified about earlier when I asked you about the
12		12	problems and issues the shelter, was there anything else
13		13	
14	Q. Doing so would be a violation of policy?A. It would be.	14	that led you to stop the volunteers? A. No.
15	Q. If Ms. Perkins was using a sheriff's office		Q. And how did you prevent the volunteers from
16	vehicle to drive to and from the shelter, would that be	16	accessing the shelter? How did you mandate this policy of
	violation of policy?		
17	A. I have seen Chastity Perkins driving that	17	no more volunteers?
18			A. We sent a letter and we changed the locks.
19	old blue Chevrolet truck that we had. She used to help	19	Q. Okay. And to whom did you send the letter? A. I think that it was Giles Animal Rescue.
20	her dad haul feed from Walmart to the shelter, but as far as Chastity Perkins driving a vehicle, I don't recall her	20	
21 22	ever driving one a vehicle that belonged to the Giles	21 22	Q. Okay. Do you know who is in charge of that organization?
23	County Board of Supervisors or the sheriff's office.	23	A. I think that it used to be it was either
		24	Charlie Herbert or Christine Owens.
24	Q. Would it be against the sheriff of Giles	24	Charite Herbert or Christine Owens.
1	Page 5		Page 57
1 2	County policy to have a civilian such as Chastity Perkins operate a Giles County sheriff's vehicle?	1 2	Q. Okay. A. Christine Link-Owens.
3	A. Probably not.	3	A. Christine Link-Owens. Q. Have you ever met her?
4	-	4	A. Yes.
5	Q. Okay.A. Using it in the using it in that form.	5	Q. Have you ever had discussions with her
6		6	about the animal shelter?
7	Q. When you say "in that form," you mean driving to the shelter?	7	
8	•	8	
9	A. If she was going to the shelter, hauling feed for the shelter for the County, I would say no.		Q. And did you have any discussions with her about the animal shelter prior to preventing volunteers
10		9	making the decision to prevent volunteers from accessing
	Q. Okay. A. If she was driving it to go and get her	10	the shelter?
11			
12	groceries at Walmart or Kroger, yes, that would be a violation.	12	A. I think that I probably did. Q. And you had some conversations with her
14		14	after that?
15	Q. Okay. Ms. Perkins is not assigned a sheriff's vehicle?	15	A. I might have; I don't know.
16	A. No, she is not.	16	Q. Has she ever expressed to you at any
17		17	time well, let me strike that. Are you aware of anyone
18	Q. But her father is? A. Yes.	18	making complaints about the sheriff's office decision to
19		19	prevent volunteers from accessing the shelter? Are you
	Q. All right.		
20	A. And he always asked me if she could take	20	aware if anyone ever made any complaint to, say, the Board
21	that old blue Chevrolet truck and help to haul the	21	of Supervisors about your decision to prevent volunteers
22	feed.	22	access to the shelter?
23	Q. At some point, you decided that you didn't	23	A. Yes.
24	want any more volunteers at the shelter; is that right?	24	Q. And what are you aware of?
1		1	

Pages 58..61

2 don't know if it was Scott or someone asked me, but they 3 said, did you tell the volunteers that they could not come 4 back to the shelter and I said, yes, I did, because 5 equipment was leaving, you know, and what put the icing on 6 the cake was when the office was broke into. 7 Q. Okay. So did you remove the key from 8 dispatch? 9 A. I think I did. 10 Q. Okay. 11 A. And then we put another one back. 12 Q. Okay. So after you removed the volunteers 13 from the shelter, as far as your knowledge is concerned, 14 the only people that were providing services to the 15 animals there were the animal control officers and 16 Chastity Perkins? 17 A. Yes. 18 Q. Okay. Did you discuss your decision to 19 prevent the volunteers from accessing the shelter at a 20 Board meeting ever? 21 A. I don't know. 22 Q. Okay. Do you recall ever well, strike 23 that. 24 A. Can we take a break? 25 that you don't really remember 26 later, but specifically G.A.R. 27 and these were Code Sections, 28 that were in the letter that we that they could not come 29 that you don't really remember 20 later, but specifically G.A.R. 20 later, but specifically G.A.R. 21 dand these were Code Sections, 21 that were in the letter that we that were in the letter that we that are in these Code Sections, 29 that were in the letter that we that are in these Code Sections, 20 made to determine whether each and reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable hours during the we designated and marked isolation in the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be r	R. highlighted the following, , I will represent to you, we'll look at, but the things ons are "Animals must be face off of the floor enabling Reasonable effort must be ch animal has a collar, tag, e made to identify and notify be accessible to the public at week. There should be a ion area for incoming animals being ill. Ill and suspected arately in an area for a eing placed in the main shelter must operate such that hts to provide regular cycles
2 don't know if it was Scott or someone asked me, but they 3 said, did you tell the volunteers that they could not come 4 back to the shelter and I said, yes, I did, because 5 equipment was leaving, you know, and what put the icing on 6 the cake was when the office was broke into. 7 Q. Okay. So did you remove the key from 8 dispatch? 9 A. I think I did. 10 Q. Okay. 11 A. And then we put another one back. 12 Q. Okay. So after you removed the volunteers 13 from the shelter, as far as your knowledge is concerned, 14 the only people that were providing services to the 15 animals there were the animal control officers and 16 Chastity Perkins? 17 A. Yes. 18 Q. Okay. Did you discuss your decision to 19 prevent the volunteers from accessing the shelter at a 20 Board meeting ever? 21 A. I don't know. 22 Q. Okay. Do you recall ever well, strike 23 that. 24 A. Can we take a break? 25 that you don't really remember 26 later, but specifically G.A.R. 27 and these were Code Sections, 28 that were in the letter that we that they could not come 29 that you don't really remember 20 later, but specifically G.A.R. 20 later, but specifically G.A.R. 21 dand these were Code Sections, 21 that were in the letter that we that were in the letter that we that are in these Code Sections, 29 that were in the letter that we that are in these Code Sections, 20 made to determine whether each and reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable hours during the we designated and marked isolation in the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be reasonable effort must be the owner. Shelters should be r	er, and we'll talk about that R. highlighted the following, I will represent to you, we'll look at, but the things ons are "Animals must be face off of the floor enabling Reasonable effort must be ch animal has a collar, tag, e made to identify and notify be accessible to the public at week. There should be a ion area for incoming animals being ill. Ill and suspected arately in an area for a eing placed in the main shelter must operate such that hts to provide regular cycles
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	Page 61
	eiter;" do you agree with that
2 (Discussion off the Record.) 2 statement, Paragraph 28? 3 (A recess was taken.) 3 A. I'm going to sa	asy diasaree
	you disagree with that?
	't remember that.
	a conversation with the
7 from their point of view, that a number of laws were being 7 Plaintiff in May of 2013 about	
	if it was May, but we did
9 A. I'm not sure. 9 discuss the animal shelter.	•
	ou recall that you discussed?
11 I'm going to read you another paragraph and then ask you	g me that Chastity wasn't
12 if you agree or disagree. 12 working the hours she was supp	pposed to be working, and, you
13 A. Okay. 13 know, she was under a contract	ct with the animal shelter,
14 0 HT M. of 2012 the Plaintiff H and that 14 and a halled to T doubt	- 3 3 16 1
14 Q. "In May of 2013, the Plaintiff," and that 14 and we talked to I don't	I don't know if it was the
	I don't know if it was the the inspections, and she said
	the inspections, and she said
15 is Mr. Dunn 15 licensing lady, whoever does t	the inspections, and she said n that someone was there
15 is Mr. Dunn 16 A. Okay. 17 Q approached the Sheriff to discuss these 18 issues plaguing the shelter," and now hold on, let me say 18 licensing lady, whoever does to discuss these 19 vou have to have verification 19 within a 24-hour period. The 19 licensing lady, whoever does to discuss these 10 licensing lady, whoever does to discuss these 11 vou have to have verification 12 licensing lady, whoever does to discuss these 13 licensing lady, whoever does to discuss these 14 licensing lady, whoever does to discuss these 15 licensing lady, whoever does to discuss these 16 you have to have verification 17 licensing lady, whoever does to discuss these 18 licensing lady, whoever does to discuss these	the inspections, and she said n that someone was there e animals could not be left
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1	${f Page} \ {f 6}$ A. That was Chris McKlarney and some of the	2 1	Page 64 shelter and comply with all pertinent laws." Do you agree
2	other Board members. I don't know if it was John Mills or	2	or disagree?
3	Jimmy McCroskey or somebody.	3	A. I disagree.
4	Q. Okay.	4	Q. Why is that?
5	A. I'm sorry.	5	A. I don't remember him telling me that I
6	Q. And you also mentioned a contract regarding	6	needed to do anything at the shelter to comply with any
7	Ms. Perkins. What do you know about that?	7	laws. The only time that I know that there was a problem
8	A. Well, I just know that Dave Hunt told me	8	is when the state inspector came in and she said the
9	that she was under contract, getting paid six hours a day,	9	floors needed to be redone, and the walls and the cages,
10	seven days a week.	10	you know, needed to have the housing welded and the locks
11	Q. Okay. Have you ever seen the contract?	11	fixed and things like that.
12	A. No.	12	Q. When you had this discussion with the
13	Q. All right.	13	Plaintiff about the animal shelter, did you know how he
14	A. I have not. It was a contract that was	14	became aware of the issues at the animal shelter?
15	agreed upon before I ever took office.	15	A. No.
16	Q. Okay.	16	Q. Okay.
17	A. And it was going smooth and I didn't I	17	A. I guess that he they did that in a Board
18	didn't do anything about it or ask to see anything.	18	meeting.
19	Q. Okay.	19	Q. So you don't recall him saying that the
20	A. Regarding the shelter.	20	Board had been discussing this?
21	Q. All right, and let me read you this	21	A. No.
22	paragraph and see if you agree or disagree, and don't	22	Q. Okay.
23	worry; this one is much smaller than all of that stuff I	23	A. He might have, and I just don't recall.
24	just read. Paragraph 29, "During this discussion," and	24	Q. Okay. Did you tell the Plaintiff in this
	Page 6	3	Page 65
1	we've referencing the May of 2013 which you don't remember		discussion, and excuse my language, and this is regarding
2	if it was May, but you recall talking to him?	2	the volunteers, "Fuck them, they are stealing food
3	A. Okay.	3	anyway." Did you say that to him?
4	Q. "During this discussion, the Plaintiff	4	A. No.
5	highlighted the numerous issues plaguing the shelter. The	5	Q. During the course of Mr. Dunn's employment
6	Plaintiff indicated the sheriff was responsible for the	6	with the sheriff's office, did he exhibit any work
7	management of the shelter and that currently, it was not	7	performance issues?
8	being managed adequately." Let me stop there. Do you	8	A. Yes.
9	agree with that statement; did he say something like that	9	Q. Okay. What were they?
10	to you?	10	A. Not getting tickets turned in on time that
11	A. I don't remember that.	11	come from the clerk on several cases.
12	Q. Let me go further. "The Plaintiff	12	Q. So tell me about that. What was he
13	indicated that the mismanagement of the shelter had	13	supposed to do and what was he not doing?
14	exposed the Board and County to legal action due to	14	A. When he would issue a summons out here on
15	illegality of the shelter's practices." Do you recall	15	the highway, you would have to turn your tickets in at the
16	that?	16	office, the summons, and then the bailiffs would carry
17	A. No.	17	them over the next morning to the General District clerk's
18	Q. All right. Let me read further. "The	18	office, and that was a common practice. If you wrote the
19	Plaintiff as a member of the Board directed the Sheriff to		ticket on Friday night, you didn't have to do it on
20	improve the conditions of the shelter and comply with all	20	Saturday or Sunday, but as long as it was in the General
21	pertinent laws." Do you agree or disagree with that?	21	District Court basket, the bailiffs could come by and pick
22	A. Do what now?	22	them up and take them to the clerk's office, and the
23	Q. "The Plaintiff as a member of the Board	23	purpose of that is, if an individual wanted to pay off
24	directed the Sheriff to improve the conditions of the	24	their fine earlier, they could, you know, do that, and the
1			

	Morgan Milliro	115	on 04/07/2015 Pages 6669
1	Page 66 clerk would have the copy of the summons that was issued,	1	Page 68 O. Time sheets?
1 2	whether it be speeding or defective equipment, something	2	Q. Time sheets? A. Yes.
3	that could be paid off, and there was several times that	3	Q. Do you recall if Mr. Dunn ever received a
4	the clerk would call and say that, you know, it hasn't	4	written notice of any of these work product deficiencies?
5	been done, and, you know, we talked to him, everything	5	A. Yes.
6	would be fine for a few days, and then it would go back	6	Q. He did?
7	again.	7	A. I think that he did on the court summonses.
8	Q. Was Mr. Dunn ever give a written notice of	8	Q. But as far as these other issues, the not
9	this performance deficiency?	9	liking supervision and the time cards?
10	A. I'm thinking that he was.	10	A. No.
11	Q. Was there any other issues with Mr. Dunn's	11	Q. It wasn't written up?
12	work performance?	12	A. No.
13	A. My mind just went blank. I'm sorry.	13	Q. Okay. Does the during the course of Mr.
14	Q. Okay.	14	Dunn's employment at the sheriff's office, did the
15	A. He didn't like supervision.	15	sheriff's office implement any written annual review, also
16	Q. Why do you say that?	16	known as an annual work performance evaluation?
17	A. He didn't like people telling him to do	17	A. We did that one or two times.
18	something, and, you know, you tell him you need to get	18	Q. Okay.
19	this done, I will get it done, I will get the assignment	19	A. And I don't know how we did that, but we
20	completed, and he he had a hard time doing what was	20	got away from that.
21	supposed to be done on his part.	21	Q. Okay. So it wasn't done consistently year
22	Q. Okay. All right, let's go to the first	22	to year?
23	thing that you said. You said that he didn't like to be	23	A. No.
24	supervised. Can you give me some examples of that?	24	Q. Okay. Do you know if Mr. Dunn ever
	Supervised. Can jou sive me some dampies of care.		v. o.m. bo for him if it. built ever
1	Page 67	1	Page 69
2	A. He didn't like people telling him what to do.	1 2	performed below expectations on any written work performance evaluation?
3	Q. How did you know what he did and didn't	3	A. No.
4	like?	4	Q. All right.
5	A. Well, I would my chief deputy would tell	5	A. On evaluation?
6	me, and he he would have issues sometimes with, you	6	Q. Yes.
7	know, getting your getting the tickets turned in on	7	A. No.
8	time, time sheets. You know, you need to in order to	8	Q. Okay. All right, I'm going to read you a
9	get paid, you have to have your time sheet turned in.	9	couple of sentences from the paragraph from the Complaint
10	Q. Can you give me any other examples of where	10	and ask you if you agree or disagree. All right,
11	Mr. Dunn demonstrated that he didn't enjoy being	11	"Plaintiff became greatly concerned that Ms. Perkins was
12	supervised?	12	not working the hours that she was being paid to work with
13	A. Not right now.	13	County funds. In July of 2013, the Plaintiff again met
14	Q. All right, the other thing that I'm	14	with the Sheriff to discuss the issues plaguing the
15	sorry, you said that he didn't like being supervised, and	15	shelter." Do you recall a meeting or a discussion with
16	what was the other thing that you said, his other work	16	the Plaintiff in July of 2013?
17	performance issue?	17	A. It may have been; I remember a discussion
		18	with him.
18 19	A. He was always late with his, you know,	19	Q. And was that an face to face discussion?
20	paperwork. Q. And that was the summonses that you talked		
		20	A. It was, he was working.
21	about?	21	Q. And were you in your office?
22	A. Yes.	22	A. I think so.
23	Q. But was there other paperwork, too?	23	Q. Was there anyone else inside of the office
24	A. Time sheets.	24	when you two had this discussion?
		1	

		Morgan Millir	ons (on 04/07/2015 Pages 7073
		Page 70)	Page 72
1	A.	I don't know.	1	agree or disagree with that?
2	Q.	Did anyone else join in on this discussion	2	A. I agree.
3	with you?		3	Q. And what did you all talk about about that
4	A.	I'm not sure.	4	subject?
5	Q.	Let me read you this and ask you if you	5	A. We talked about David Fields.
6	agree or disa	gree. "During this meeting, the Sheriff	6	Q. Okay.
7	acknowledged	that he knew that Ms. Perkins was not working	7	A. And Mark Wilburn.
8	all of the ho	ours for which she was being paid." Do you	8	Q. Okay. What did Mr. Dunn say?
9	agree or disa	gree?	9	A. He said that their time sheets are not
10	A.	I disagree.	10	right.
11	Q.	Why is that?	11	Q. All right.
12	A.	One of those times where I don't know about	12	A. And I didn't find any discrepancy for David
13	if I talked t	to Dave Hunt during that time to see what was	13	Fields. David Fields would come into work early and stay
14	going on		14	late. Mark Wilburn, I did find some discrepancies. He
15	Q.	Okay.	15	was doing work for the school and he wasn't marking his
16	A.	with her, and to see how many hours she	16	time sheet, and I told him he needed to start doing that,
17	was working a	at the shelter.	17	and that problem was taken care of.
18	Q.	All right.	18	Q. Did during this discussion, did you and
19	A.	But then he made it clear that she was	19	Mr. Dunn discuss the funds that were being allocated to
20	paid, you kno	ow, six hours a day, seven days a week.	20	the sheriff's office to manage the shelter at all? For
21	Q.	All right.	21	instance, did you all discuss
22	A.	Whether she worked, you know, four to six	22	A. We were just talking about time sheets.
23	or two to fou	r.	23	Q. Yes. In the paragraph that I read to you,
24	Q.	Okay, and in July of 2013, was there a	24	it said that this talk about the talk about issues with
		Page 71		Page 73
1	when was the	time clock put in place?	1	the shelter, Perkins' hours, and the time sheets of other
2	A.	I don't know that.	2	officers, according to the Complaint, all occurred at one
3	Q.	Okay.	3	time?
4	A.	I don't know how to answer that, but I'm $$	4	A. Okay.
5	thinking that	tit I don't know when Jay Williams got on	5	Q. Do you agree or disagree with that?
6	the Board. W	Tas it at the same time that you did? Okay.	6	A. I'm going to disagree because I don't
7	Jay asked abo	out a time clock, that way we could put a	7	remember that.
8	time clock at	the shelter; that way she could mark in,	8	Q. Okay, did you ever recall any discussion
9	mark on, and	then when she left, she could mark off, and	9	with Scott Dunn about the money that was going to the
10	that way he o	could have some type of documentation of when	10	sheriff's office from the County to pay for the services
11	the shelter w	as occupied.	11	of the County, for the employees and so forth?
12	Q.	Okay.	12	A. Yes.
13	A.	That was because of the state inspector.	13	Q. Okay, and what do you recall about that
14	Q.	Okay.	14	discussion?
15	A.	And I don't know if they ever put a camera	15	A. I remember he said the County puts a lot of
16	out there or	not.	16	money into the shelter and animal control.
17	Q.	Okay.	17	Q. Okay. And what was your response?
18	A.	But I think that they went the cheaper	18	A. I don't remember.
19	route.		19	Q. Is that the only thing that you recall?
20	Q.	Let me ask you if you agree or disagree	20	A. I remember him saying that. I mean, that
21	with that. F	Paragraph 39, "During this meeting, the	21	is a lot of questions. I'm trying to remember. I don't
22	Plaintiff als	so indicated that he knew of other employees	22	remember.
1	علىمام مام عم	fla domestment the had falaified their time	23	O Do row modell the Disintiff arow indicating
23	of the sherif	f's department who had falsified their time	23	Q. Do you recall the Plaintiff ever indicating
23 24		you ever have a discussion with do you	24	to you that he was concerned with being implicated in

	Morgan Millirons on 04/07/2015 Pages 7477			
	Page 74		Page 76	
1	criminal liability for how the sheriff's office was	1	told them, you know, they asked us they asked me, do	
2	operating?	2	you want us to take it over, and I said, sure, you know,	
3	A. No.	3	and I didn't want to be part of that.	
4	Q. Did you ever have a discussion with Scott	4	Q. Who who asked you	
5	Dunn about whether or not an individual could file some	5	A. I'm thinking that I'm thinking that it	
6	sort of whistle blower action because of what was going	6	was Chris McKlarney. I'm not sure, but I did ask them,	
7	on?	7	you know, if they would take it back.	
8	A. No.	8	Q. All right.	
9	Q. Did the Board ever ask you to return the	9	A. And they did take it back.	
10	key to dispatch?	10	Q. I want to make sure that I understand	
11	A. I don't know if they did or not.	11	this. I want to know who asked who first. Let me get it	
12	Q. All right.	12	on the Record. Did you ask for the County to take over	
13	A. I don't know. I remember we had a I was	13	the shelter or did the County ask you for them to do	
14	talking to Chris McKlarney, the County administrator, and	14	you want us to take over the shelter; in other words, who	
15	I told him the last thing I wanted to do was keep good	15	instigated this idea?	
16	help away from the shelter, because they are good people	16	A. I don't know who asked first.	
17	out there, but one person can ruin it for everybody.	17	Q. Okay.	
18	Anything that I do is not set in stone if I did return the	18	A. I don't remember who asked first, and I	
19	key back to dispatch, and whether or not it was there or	19	think that I was asked; I said I was asked, do you want	
20	not, it did go back, and I told my people, you know, you are going to have to get along with people.	20	us to take it over, I'm thinking but I'm not positive, but I said, let me think about it, and then Pulaski County had	
21 22	Q. Who did you tell that to?	22	an issue and I thought, well, I didn't want to be part of	
23	A. I told Chastity that; I told Marilyn	23	that.	
24	Hollie, and I told Frank Gough and I told I don't know	24	Q. I'm trying to remember what was going on in	
21	norme, and I cold right gough and I cold I don't know	21	Q. I in crying to remember what was going on in	
1	Page 75 if was Melvin or Melvin Dalton or if it was Jeff	1	Page 77 Pulaski; do you recall?	
2	Spicer.	2	A. No, I don't.	
3	Q. Okay.	3	Q. But there was some lawsuit involving an	
4	A. But I told them, we have good people out	4	animal shelter?	
5	here that want to help and I am not against allowing	5	A. Yes, there was. It may have been Radford;	
6	somebody to help that really wants to help. If somebody	6	I don't know.	
7	wants to help, they are going to make it work.	7	Q. Okay. And so were you concerned about	
8	Q. Did you ever appear at a Board meeting to	8	liability?	
9	specifically address the issues regarding the volunteers	9	A. Yes.	
10	at the shelter?	10	Q. Why were you concerned about liability?	
11	A. No, not that I know of.	11	A. Because all it takes is one person to cause	
12	Q. Other than your conversation with Mr.	12	you some problems.	
13	McKlarney, did you ever have any other conversations with	13	Q. Okay.	
14	any other Board members regarding the animal shelter and	14	A. And I have too much to worry about.	
15	the volunteers?	15	Q. Okay.	
16	A. I could have, but I don't know. I didn't	16	A. And somebody else, you know, has the time	
17	go before the Board in a Board meeting and do that, just	17	and the dedication and they want to dedicate it to that	
18	for that.	18	specific purpose.	
19	Q. Do you recall when it was that the County	19	Q. Earlier you mentioned the state	
20	took over the management of the shelter?	20	investigator, and I believe that we were talking about the	
21	A. No, I don't.	21	Department of Agriculture investigator?	
22	Q. What reason were you provided for that	22	A. I'm thinking; I think that is who it was.	
23	action by the Board?	23	Q. Are you aware of whether or not someone	
24	A. There was a big lawsuit in Pulaski and I	24	filed a claim or not a claim but a complaint with the	

			_	JII 04/07/2013	1 ages 7001
1	Virginia Depa	Page 78 urtment of Agriculture because of what was	1	Q. Okay.	Page 80
2	going on at t		2	A. I think that I wer	nt through Chris
3	Α.	I don't know.	3	McKlarney.	
4	Q.	All right.	4	Q. Okay, and we'll ju	ast leave the last
5	A.	I'm not aware of that.	5	question, did you ever write her	a letter?
6	Q.	Did you ever have any discussions with	6	A. No, not that I kno	ow of.
7	anyone who wa	s investigating for the State of Virginia	7	Q. Okay. All right,	if at the sheriff's
8	what was goin	ng on at the animal shelter?	8	office, if there is equipment that	at you wish to surplus,
9	A.	No. We had a meeting set up at the animal	9	what does that mean to you? What	is the definition of
10	shelter one d	lay.	10	surplus in that statement?	
11	Q.	Okay.	11	A. It means get rid o	of it.
12	A.	And I did not get to attend that meeting.	12	Q. Okay, and where do	pes it go?
13	We had someth	ning else going on.	13	A. Wherever if I h	nave it, I take to the
14	Q.	What was going on?	14	County garage and take the tags of	off of it.
15	A.	We had a call in Pembroke; an individual	15	Q. Okay, are you talk	sing about like an
16	got caught ha	wing sex with a dog.	16	automobile?	
17	Q.	Okay. And you had to personally appear at	17	A. An automobile.	
18	that?		18	Q. Okay, and who take	es it from there, the
19	A.	I did.	19	County?	
20	Q.	Was no one else available?	20	A. I think so.	
21	A.	It was my dog.	21	Q. Okay. But you car	n surplus other things
22		MR. STRELKA: Okay. Off the Record for a	22	other than a car, right?	
23	secon	nd.	23	A. Do what?	
24		(Off the Record.)	24	Q. You can the ter	m "surplus" is used a lot
		D 70			D 01
1	BY MR. STRELK	Page 79	1	by, for instance, Mr. Dunn. He s	Page 81 says it all the time and
2	Q.	Back on the Record, all right, was that	2	I've read it in Board meetings ar	-
3	meeting that	you had attended, do you know if that was on	3	and I just want to know what your	runderstanding of that
4			١.		. and crotanding or and
1 -	or around Aug	rust of 2013?	4	word is.	diacipulating of that
5	or around Aug A.	gust of 2013? I'm thinking that it was.	5	word is. A. Get rid of.	. understanding of that
				A. Get rid of.	re any policies about how
5	Α.	I'm thinking that it was.	5	A. Get rid of.	
5 6	A. Q.	I'm thinking that it was. Okay.	5	A. Get rid of. Q. Okay, and are then	
5 6 7	A. Q. A.	I'm thinking that it was. Okay. Chris McKlarney attended.	5 6 7	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No.	
5 6 7 8	A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay.	5 6 7 8	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No.	re any policies about how
5 6 7 8 9	A. Q. A. Q. A.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend.	5 6 7 8 9	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit?	re any policies about how
5 6 7 8 9	A. Q. A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right?	5 6 7 8 9	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit?	re any policies about how e of any sheriff's office cy, you know, we always
5 6 7 8 9 10 11	A. Q. A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know.	5 6 7 8 9 10 11	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count	re any policies about how e of any sheriff's office cy, you know, we always
5 6 7 8 9 10 11 12	A. Q. A. Q. A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended?	5 6 7 8 9 10 11 12	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I	re any policies about how e of any sheriff's office cy, you know, we always
5 6 7 8 9 10 11 12 13	A. Q. A. Q. A. Q. A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have.	5 6 7 8 9 10 11 12 13	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself.	e of any sheriff's office cy, you know, we always don't get rid of anything
5 6 7 8 9 10 11 12 13 14	A. Q. A. Q. A. Q. A. Q. A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator	5 6 7 8 9 10 11 12 13 14	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them	e of any sheriff's office cy, you know, we always don't get rid of anything
5 6 7 8 9 10 11 12 13 14 15	A. Q. A. Q. A. Q. A. Q. A. Q. for the Depart	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator attent of Agriculture attended? I think that she was there. I think that	5 6 7 8 9 10 11 12 13 14 15	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them	re any policies about how e of any sheriff's office ty, you know, we always don't get rid of anything
5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. Q. A. Q. A. Q. A. Q. A. A. A. Q. A. A. A. A. Q. for the Depart A.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator attent of Agriculture attended? I think that she was there. I think that	5 6 7 8 9 10 11 12 13 14 15 16	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County?	re any policies about how e of any sheriff's office ty, you know, we always don't get rid of anything
5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. A. Q. A. Q. A. Q. A. Q. for the Depar A. it was a fema	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator extent of Agriculture attended? I think that she was there. I think that alle.	5 6 7 8 9 10 11 12 13 14 15 16 17	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County?	re any policies about how e of any sheriff's office ry, you know, we always don't get rid of anything to present it to the
5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. it was a fema	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator extent of Agriculture attended? I think that she was there. I think that alle.	5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County? A. Yes, it is just ar	re any policies about how e of any sheriff's office ry, you know, we always don't get rid of anything to present it to the
5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A. Q. A. Q. A. Q. it was a fema Q. up with her?	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator attent of Agriculture attended? I think that she was there. I think that ale. Yes, she was, but you never ultimately met	5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County? A. Yes, it is just ar will give it to them and let them fit.	re any policies about how e of any sheriff's office ry, you know, we always don't get rid of anything to present it to the
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q. A. Q. A. Q. A. Q. to the Depar A. it was a fema Q. up with her? A.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator extment of Agriculture attended? I think that she was there. I think that alle. Yes, she was, but you never ultimately met I didn't.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County? A. Yes, it is just ar will give it to them and let them fit.	te any policies about how e of any sheriff's office ty, you know, we always don't get rid of anything to present it to the n unwritten policy, and I n do with it what they see
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q. A. Q. A. Q. for the Depar A. it was a fema Q. up with her? A. Q.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator extent of Agriculture attended? I think that she was there. I think that alle. Yes, she was, but you never ultimately met I didn't. Did you ever speak with her over the phone?	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County? A. Yes, it is just ar will give it to them and let them fit. Q. Have you ever give	te any policies about how e of any sheriff's office ty, you know, we always don't get rid of anything to present it to the n unwritten policy, and I n do with it what they see
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A. Q. A. Q. A. Q. for the Depar A. it was a fema Q. up with her? A. Q. A.	I'm thinking that it was. Okay. Chris McKlarney attended. Okay. And I didn't get to attend. And Ms. Perkins attended; is that right? I don't know. Do you know if Mr. Dalton attended? He might have. Okay, and do you know if the investigator thent of Agriculture attended? I think that she was there. I think that ale. Yes, she was, but you never ultimately met I didn't. Did you ever speak with her over the phone? I don't know if I did or not.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Get rid of. Q. Okay, and are then you are to surplus an item? A. No. Q. So you may dispose property as you see fit? A. If if the Count let the County have it, so no, I myself. Q. Okay. A. I always let them Q. So your policy is County? A. Yes, it is just ar will give it to them and let them fit. Q. Have you ever give law enforcement agency?	te any policies about how e of any sheriff's office ty, you know, we always don't get rid of anything to present it to the n unwritten policy, and I n do with it what they see en a vehicle to another

	Mo	rgan Millirons (on 04/07/201	5 Pages 8285
		Page 82		Page 84
1	A. The County has.		Q.	Okay. And do you know if he ever met with
2	Q. Okay. And I'm going to read			okkeeper of the Town of Pembroke to inspect
3	paragraph, and you let me know if you agree		one of the veh	
4	A. Okay.	4	Α.	No.
5	Q. "In August of 2013, the Chie		Q.	Did you ever get upset about how Mr. Dunn
6	Pembroke Police Department, Douglas Sadler,		_	not working regarding these vehicles? I
7	Sheriff to inquire about the possibility of			e ever any issue regarding these vehicles
8	surplus law enforcement vehicle from the sh		and Mr. Dunn i	
9	office. Did that ever occur; do you agree	·	Α.	Yes.
10	A. I think that he did. Differ		Q.	What was that?
11 12	every year. I'm sure that he did, pretty s		A.	I got a call from one of the field deputies
	Q. Did you tell him that you ha			ey are taking the stripes off of a vehicle
13	A. I told him we probably did. five at the time.	We had four or 13		sing on patrol.
15	Q. Okay. And did did you al		Q. A.	All right. And myself and Mike Falls went to the
16	surplusing of multiple vehicles to the Pemb			age and they had taken the stripes off of a
17	Department or just one?	10 In the police		e just put a new transmission in and four
18	A. I'm thinking that he asked f		new tires on.	e just put a new transmission in and four
19	mayor called me and asked for an additional		Q.	All right.
20	Q. Okay. And that might have h		Α.	And I did get mad.
21	later time?	21	Q.	So was that not the vehicle that you
22	A. It might have, yes.	22	intended to su	=
23	Q. Okay.	23	A.	No.
24	A. I think that it was Poteet v		Q.	It was so that vehicle was a completely
			£.	
1	mayor then.	Page 83 1	separate vehic	Page 85 le from the ones that you had discussed with
2	Q. Okay. And so after that cor		Sadler and the	_
3	Mr. Sadler, what did you do regarding these		A.	No, I I told Doug Sadler that they can
4	A. I didn't do anything.	4		they have. He had to work it out with the
5	Q. Did you ever surplus did			I got rid of them, that was out of my
6	them back to the County; did you ever prese		control.	
7	County?	7	Q.	Okay.
8	A. I think we talked to the Cou	nty and told 8	Α.	I mean, I could care less, but it was not
9	them that I had a couple of other vehicles		the ones that	I sent, the VIN numbers to the County
10	surplus.	10	administrator'	s office.
11	Q. Okay.	11	Q.	Okay.
12	A. And I I think that I sent	an email to 12	A.	And I sent it by email.
13	Chris McKlarney telling him which one I war	ted to get rid 13	Q.	Okay.
14	of, plus he had some additional vehicles do	wn at the 14	A.	I sent it to Chris McKlarney.
15	school bus garage.	15	Q.	Okay. Did you ever raise your voice at
16	Q. Okay.	16	Scott Dunn abo	ut this issue?
17	A. The County garage.	17	Α.	I did.
18	Q. Okay. So who on the Board of	id you have a 18	Q.	Did you ever use profanity?
19	discussion with?	19	Α.	I did.
20	A. That is Chris McKlarney, Co.	nty 20	Q.	I will read you this additional paragraph.
21	administrator.	21	"In December	of 2013, the Department of Agriculture
22	Q. Okay. Do you know if Scott	Dunn ever met 22	issued a repor	t which cited a number of deficiencies then
23	with Chief Sadler about this, about these v	rehicles? 23	present at the	shelter." Do you agree or disagree?
24	A. I'm sure he probably did.	24	A.	I agree.

		Morgan Minni)115 (011 04/07/2015 1 ages 60
1	Q.	Page 86 Did you ever read that report?	1	Page 8 Q. That they have individualized user names
2	Α.	I did.	2	•
3	Q.	Did you agree with it?	3	
4	Α.	I did.	4	
5	Q.	Let me read you this paragraph. "The Board	5	
6		Sheriff terminate the employment of Ms.	6	
				•
7		he Sheriff refused to fire her." Let's start	7	
8		t half of that sentence. Did the Board ever	8	
9	-	terminate Ms. Perkins?	9	1
10	Α.	No.	10	
11	Q.	Okay. Did they ever ask you to?	11	
12	A.	No.	12	
13	Q.	All right. Did anyone ever ask you to and	13	* * * *
14	you refused t	o fire her; you said that you will not fire	14	• •
15	her?		15	•
16	Α.	No.	16	A. And or have one of my employees to do
17	Q.	All right. If I said the word "CAD" to	17	that.
18	you, what do	you understand that to mean?	18	Q. Okay.
19	A.	Computer Aided Dispatch.	19	A. And get instructions on how to amend or
20	Q.	And what is that?	20	edit an entry onto the system.
21	A.	That is a computer program that our	21	Q. Okay, and have you ever done that before?
22	dispatchers u	se to log down each and every call that comes	22	A. I did.
23	into the Sher	iff's office that has action to it. If	23	Q. And how did you go about doing that?
24	and every tim	e that there is something brought up on the	24	A. I had Mark Skidmore, he was a retired
		Page 87	-	Page 8
1	CAD system, i	t's locked in there, into the hard drive.	1	
2	Q.	Okay. And if an officer is on, let's say	2	system.
3	dispatch indi	cates to an officer of the sheriff's office	3	Q. Okay.
4	that he's nee	ded, at what point does that officer utilize	4	A. Or the system at the sheriff's office, and
5	the CAD syste	m? In other words, what do they in the	5	I told him I wanted a couple of lines deleted from the CA
6	course of his	duties, when is a deputy going to utilize	6	system.
7	the CAD syste	m?	7	Q. Okay, and he was working at Dapro at this
8	A.	The deputy has to utilize the CAD system	8	time?
9		their reports.	9	A. No, no.
10	Q.	Okay. And is everyone does everyone	10	
11	have access t		11	
12	A.	They do.	12	· · ·
13	Q.	And by "everyone" I mean all of the	13	Q. Okay.
14	deputies?		14	
15	Α.	All of the sheriff's office employees, yes.	15	• •
16	Q.	Okay.	16	•
17	Α.	And dispatchers.	17	•
18	Q.	Okay, and do I have it right that these	18	· · · · · · · · · · · · · · · · · · ·
19		t I mentioned have individualized user names	19	•
20	and passwords		20	
21	and passwords		21	
		Yes.		
22	Q.	I'm sorry, just wait until I get it on the	22	• • •
23	Record.		23	
24	73.	T Im govern	2.4	O And did he areas shore there instructions
24	A.	I'm sorry.	24	Q. And did he ever share those instructions

Pages 90..93

		William William		1 uges > 0.1>0
1	with you?	Page 90	1	Page 92 because he had a fantasy football meeting.
2	A.	No.	2	Q. And why was that comment inappropriate?
3	Q.	Okay. But he did it at your direction?	3	A. Because that was a derogatory comment from
4	Α.	He did.	4	an individual that was upset.
5	Q.	So you specifically told him what to	5	Q. Was that Mr. Dunn
6	change?	be few specialisting out in mine of	6	A. It was.
7	А.	I told him and Captain Joe Shanks.	7	Q who entered that information?
8	Q.	Okay.	8	A. He did.
9	Α.	I said, take that out of there, if you	9	Q. And did you ever have a personal discussion
10	can.	1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	10	with Mr. Dunn about that information?
11	Q.	Okay.	11	A. I did.
12	Α.	And they contacted the Dapro system.	12	Q. And can you tell me what he said?
13	Q.	Okay.	13	A. He said that is just the way that it was;
14	Α.	The coordinator, and he told them what to	14	that is what happened, and that is you know, that is
15	do.		15	inappropriate.
16	Q.	Are is the information that an officer	16	Q. All right.
17	-	he CAD system, is that ever used in the	17	A. You don't know where these CAD cards are
18	-	prosecution of any case, any charge?	18	going to end up, ever.
19	Α.	The CAD system, it could be, yes.	19	Q. Were you concerned about how this comment
20	Q.	And the information, you said it's like	20	might affect the image of the sheriff's office?
21	-	ard drive. Is that physically at the	21	A. Exactly.
22	sheriff's off		22	Q. And have you ever made any other deletions
23	Α.	It is on the server.	23	to a CAD system other than this before?
24	Q.	It is on the server?	24	A. No.
	~			
1	Α.	Page 91 Yes. I'm pretty sure I don't know if it	1	Page 93 Q. All right.
2		h or the server is at the sheriff's office.	2	A. Now, as far as a report, going in and
3	0.	I will represent to you that I filed a	3	saying, hey, you put this sentence in here twice, you
4	~	apro early on in this case to get electronic	4	know.
5	_	ased on the CAD. I wanted their files; I	5	Q. Sure.
6		nformation, and they informed me that they	6	A. You know, but as far as a CAD card, no.
7		s any of it, that hold on one second.	7	Q. All right.
8	A.	Yes.	8	A. And I got Bobby Lilly, the Commonwealth's
9	Q.	That that information is possessed by the	9	attorney's permission to remove that from the CAD system,
10		ice; would you agree or disagree with that?	10	and he said that it has no bearing on the evidence
11	A.	I agree.	11	whatsoever.
12	Q.	Okay, and it is on a server?	12	Q. Okay. The individual that Mr. Dunn
13	Α.	Yes, and I don't know if there is a server	13	indicated was at a fantasy football event, do you know why
14		- see, dispatch is a block and a-half away	14	Mr. Dunn needed that individual at the time?
15		iff's office. I don't know if it is on a	15	A. He said that he found some extra evidence
16		sheriff's office or if there is a server in	16	at that location.
17	dispatch.	preciate b office of it diete is a servet ill	17	Q. Okay.
18	Q.	Okay. The dispatch, though, is part	18	A. And I had an investigator that was there
19	Q. A.	It is part of sheriff's office.	19	earlier that day to completely photograph and process
20	A. Q.	Okay. And why were you making deletions to	20	everything, and he had already been there; he had done
21	_	m that we were just talking about?	21	everything. He said that if he said that he found a
22	A.	There was an inappropriate comment.	22	set of tire tracks, and, well, they had already talked to
23	Q.	And what was that comment?	23	the owner of the business, but there was no there was
24	Q. A.	It was an investigator could not respond	24	no photographs or anything or any proof that there was any
²	А.	To was an investigator courd not respond	2 1	no procograpus or anything or any proof that there was ally

Pages 94..97

Q. footprint that called a state A. Q. that? A. Q. to you the prethe store that A. Q.	Page 94 The that was there. Did Mr. Dunn ever talk to you about a at the desired to have a I think that it is ic lift of to preserve for evidence? Was that the one on the door? I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind at the owner indicated were not his?	1 2 3 4 5 6 7 8 9 10	Page 96 have any reason to be in the chief deputy's office, but I don't remember the exact date. Q. Okay. So at some point, Mr. Dunn was demoted? A He was. Q. Why was he demoted? A. For there was the CAD call, there was the CAD call, putting the derogatory comment on the CAD
Q. footprint that called a state A. Q. that? A. Q. to you the prethe store that A. Q.	Did Mr. Dunn ever talk to you about a at he desired to have a I think that it is ic lift of to preserve for evidence? Was that the one on the door? I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	2 3 4 5 6 7 8	don't remember the exact date. Q. Okay. So at some point, Mr. Dunn was demoted? A He was. Q. Why was he demoted? A. For there was the CAD call, there was
footprint that called a state A. Q. that? A. Q. to you the prethe store that A. Q.	the desired to have a I think that it is ic lift of to preserve for evidence? Was that the one on the door? I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating esence of a second set of tire tracks behind	3 4 5 6 7 8	Q. Okay. So at some point, Mr. Dunn was demoted? A He was. Q. Why was he demoted? A. For there was the CAD call, there was
called a stat A. Q. that? A. Q. to you the pr the store that A. Q.	Was that the one on the door? I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	4 5 6 7 8 9	demoted? A He was. Q. Why was he demoted? A. For there was the CAD call, there was
A. Q. that? A. Q. to you the pr the store that A. Q.	Was that the one on the door? I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	5 6 7 8 9	A He was. Q. Why was he demoted? A. For there was the CAD call, there was
Q. that? A. Q. to you the pr the store that A. Q.	I'm just asking you, do you ever recall Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	6 7 8 9	Q. Why was he demoted? A. For there was the CAD call, there was
that? A. Q. to you the pr the store that A. Q.	Yes. And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	7 8 9	A. For there was the CAD call, there was
A. Q. to you the pr the store that A. Q.	And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	8 9	
Q. to you the prothe store that A. Q.	And do you ever recall Mr. Dunn indicating resence of a second set of tire tracks behind	9	
to you the pr the store that A. Q.	resence of a second set of tire tracks behind		system. There was an investigation of a larceny of a
the store that A. Q.			firearm by a convicted felon, and he got a confession out
A. Q.		11	of him and he never placed a charge, and there was another
~	No.	12	breaking and entering of a residence; I believe that it
Dunn about	Did you ever have a discussion with Mr.	13	was in the Wolf Creek area, and he had people running
	in which he told you that he had a	14	everywhere, and I had two investigators that were going to
	th the owner about the evidence at the scene?	15	Alleghany County and they told me that they needed a
Α.	I don't remember the second set of tracks.	16	report done.
Q.	Okay. Did do you know if it rained that	17	I told Scott to write a report, and and
evening?	-	18	he, in his narrative was "secured scene until
Α.	No.	19	investigators arrived," and and there was a domestic
Q.	All right.	20	call which he responded to. It took care of itself, which
A.	I don't; I can't remember that.	21	a lot of them do, and it flared up again, the dispatcher,
Q.	Okay. All right, I will read you this,	22	T.J. Adkins, gave him a call to return to the location a
part of this	paragraph, and ask you if you agree or	23	little while later; it may have been an hour or a couple
disagree. "C	n or around September 23, 2013, a work order	24	of hours, and his response was, I don't work the road,
	D 05		D 07
was created i	8	1	Page 97 give that to a deputy, and he was a deputy sheriff just
the locks on	the investigator's office at the sheriff's	2	like anybody else. I mean, I answer calls, I make
department."	Do you agree or disagree with that?	3	arrests, and everybody else does.
Α.	Okay.	4	Q. Okay. Did Mr. Dunn ever discuss with you
Q.	You agree?	5	how he was upset about the revision to the CAD entry?
A.	Okay, I will agree with it.	6	A. No.
Q.	Okay, let me read this. "However, the only	7	Q. He never did you ever have a discussion
lock the Sher	iff changed was a lock to the Plaintiff's	8	with him about it, a conversation?
		9	A. I don't know if I did or not, but I know
A.	I didn't change that.	10	what was put on the CAD system from his computer.
Q.	Okay, was the lock changed?	11	Q. Okay.
A.	It was.	12	A. And that was unacceptable.
Q.	By whose direction?	13	Q. All right, and so the decision to put the
A.	Mike Falls.	14	lock by Major I think you said Major Falls?
Q.	And you didn't tell Mike Falls to change	15	A. Yes, Mike Falls.
it?		16	Q. Mike Falls, okay, the decision to place the
A.	No.	17	lock on that door that we just talked about by Mike Falls
Q.	He just made that decision?	18	was made because Mr. Dunn had been demoted?
A.	He made that decision.	19	A. Yes, this was after his demotion.
Q.	Do you know why he made that decision?	20	Q. Okay. And do you recall your conversation
A.	He made that decision because the Plaintiff	21	with Mr. Dunn when you demoted him; you gave him the
was no longer	a lieutenant.	22	demotion or let him know that he was going to be demoted?
Q.	Okay.	23	A. Yes.
A.	And and he and he didn't	24	Q. Do you recall what you said?
	evening? A. Q. A. Q. part of this disagree. "Compart of this disagree." was created if the locks on department." A. Q. A. Q. lock the Sher office." Do A. Q.	A. No. Q. All right. A. I don't; I can't remember that. Q. Okay. All right, I will read you this, part of this paragraph, and ask you if you agree or disagree. "On or around September 23, 2013, a work order Page 95 was created indicating that the Sheriff intended to change the locks on the investigator's office at the sheriff's department." Do you agree or disagree with that? A. Okay. Q. You agree? A. Okay, I will agree with it. Q. Okay, let me read this. "However, the only lock the Sheriff changed was a lock to the Plaintiff's office." Do you agree or disagree with that? A. I didn't change that. Q. Okay, was the lock changed? A. It was. Q. By whose direction? A. Mike Falls. Q. And you didn't tell Mike Falls to change it? A. No. Q. He just made that decision? A. He made that decision. Q. Do you know why he made that decision? A. He made that decision because the Plaintiff was no longer a lieutenant. Q. Okay.	A. No. Q. All right. A. I don't; I can't remember that. Q. Okay. All right, I will read you this, part of this paragraph, and ask you if you agree or disagree. "On or around September 23, 2013, a work order Page 95 was created indicating that the Sheriff intended to change the locks on the investigator's office at the sheriff's department." Do you agree or disagree with that? A. Okay. Q. You agree? A. Okay, I will agree with it. Q. Okay, let me read this. "However, the only lock the Sheriff changed was a lock to the Plaintiff's office." Do you agree or disagree with that? A. I didn't change that. Q. Okay, was the lock changed? A. It was. Q. By whose direction? A. It was. Q. By whose direction? A. Mike Falls. Q. And you didn't tell Mike Falls to change it? A. No. Q. He just made that decision? A. He made that decision. Q. Do you know why he made that decision? A. He made that decision because the Plaintiff was no longer a lieutenant. Q. Okay.

Page 100 2 back. 3 C. Gkay. Red in your mind, who was the old 4 Scott Dunn? 5 A. Someone who sented to get out here und 5 amove cells and do his swell. 7 C. Do you recall swylar to him that "evaryone in this department hates your P'ing guta"? 9 A. Bo. 10 Q. All right. 11 A. I don't recall that. Can be take a break in this department hates your P'ing guta"? 11 A. I don't recall that. Can be take a break in this department hates your P'ing guta"? 12 for a second? 13 Q. Sure. 14 mm NITHENSS: I will be right back, sousse in the man in this department hates your Pring guta in the system of the second; in this department in the system of the second in the second right to your? 1 briefly. 1 briefly. 2 A. Kes. 3 Q. Row, I've got a bunch of documents here, but a number of these we've going to look at jour. 2 around October 21, 2013 from the sheriff's office idoes that cannot right to your? 1 briefly. 2 A. Kes. 3 Q. Row, I'd we got a bunch of documents here, but a number of these we've going to look at jour. 4 already saked — I've already saked you a number of speculcous and you ve given as a bunch of successes, I will be selected in the second in		Widigan William		UN V 1/ V / ZVIE 1 U5 CS > 0 11 U1
O. Ckay. Send in your mind, who was the old someth nearest calls and do his work. A. Someth nearest calls and do his work. O. Do you recall saying to him that 'everyone in this department hates your Fing gatar? A. No. O. All right. A. I don't recall that. Can we take a hreak. If for a second? Sure. The MCTNESS: I will be right back, sexuase in the second of the sexual second o	1			e
4 A. It's electronic. 5 A. Someone who wanted to get out here and 6 answer calls and do his work. 7 Q. Do you recall saying to him that 'everyone 7 ask you to see the invoices that Greenbrier had been 8 answer calls and do his work. 8 in this department takes your P'ing gords'? 9 A. No. 9 A. No. 9 A. No. 9 A. No. 10 Q. All right. 11 A. I don't recall that. Can we take a break 11 A. No. 12 for a second? 12 for a second? 13 Q. Sure. 12 Q. And did Mr. Durn ever sak? 14 THE WINDESS: I will be right back, excase 15 G. Do you recall him ever sending a Freedom of 16 Information Act request to the sheriff's office after be hand of other 21, 2013 from the sheriff's office does 20 accord October 21, 2013 from the sheriff's office does 21 that sound right to you? 15 PAY NR. STERLIN: 16 Q. Now, I've got a bunch of documents here, 22 that sound right to you? 17 Paye 99 1 briefly. 2 A. Gkay. 3 Q. I have an outline, and given that we've 3 documents and noving past thes, so for everyone's aske, 17 quested with the law in believing by the skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking for 9 poetstons and you've given me a bound of answer. I will 6 probably be skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking by the skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking by the skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking by the skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking by the skipping churke of this cuttine with these 6 documents and noving past thes, so for everyone's aske, 17 quested with the was looking by the skipping churke of this work. 15 The sitting here looking at your compater in space,	2	back.	2	there is an icon for it.
5 manewer calls and do his work. 7 Q. Do you recall saying to him that 'everyone in this department hates your P'ing gats"? 9 A. No. 10 O. All right. 11 A. I don't recall that. Can we take a break 12 for a second? 12 for a second? 13 O. Sure. 14 THE WINESS: I will be right book, excesse 15 mo. All right; book on the Record, my records 16 mo. 16 (A recess was taken.) 17 BY MW. STREEPA: 19 indicate, Sheriff, that Mr. Durn was tenminated on or 20 around october 21, 2013 from the sheriff's office; does 1 that sound right to you? 21 Diriefly. 22 A. Yes. 3 O. No., I've got a bunch of documents here, but a number of these we're going to look at just. 25 The triefly. 26 A. Okay. 3 O. I have an outline, and given that we've 4 already asked — I've already asked you a number of guestions and you've given as a bound source, I will be received the severy 16 mo. All right; department; and you've given a bound on a sweet, I will be received the severy 17 mo. Do. All right; and you would have the authority as the employee of the sheriff's office? 16 mo. All right to you? 27 A. Wes. 3 O. I have an outline, and given that we've 4 already asked — I've already asked you a number of guestions and you've given as a bound of answers, I will be probably be skipping chanks of this outline with these documents and moving past them, so for everyone's sake, if 8 T'm sitting here looking a few computer in space, we're 9 moving head, actually; I'm cutting stuff, just to let 20 A. Yes. 3 O. And has it been distributed to every 14 employee of the sheriff's office? 4 A. Yes. 5 A. It is on line? 6 A. Yes. 7 A. Wes. 8 The without past them, so for everyone's sake, if 9 A. Yes. 9 A. Yes. 9 A. No. 9 D. you recall what he was looking for? 9 A. I don't remember. 12 O. Okay. 13 A. I don't remember. 14 A. We'te friends. 15 O. Okay. 16 A. Yes. 17 A. We'te friends. 18 A. Yes. 19 O. Okay. 19 A. No. 19 O. Okay. 20 A. We'te friends. 21 A. We'te friends. 22 A. We'te friends. 23 C. Okay.	3	Q. Okay. And in your mind, who was the old	3	Q. All right.
6 answer calls and do his work. 7 Q. Do you recall saying to him that "everyone in this department hatces your F'ing guts"? 9 A. No. 10 Q. All right. 11 A. I don't recall that. Can we take a break for a second? 12 for a second? 13 Q. Sure. 14 THE MITNESS: I will be right back, excess the me. 15 me. 16 (A recess was taken.) 17 EX ME. STEELEA: 18 Q. All right, back on the Record, my records in indicate, Sheriff, that Mt. Dunn was terminated on or around october 21, 2013 from the sheriff's office: does that sound right to you? 19 A. No. 10 Q. Now, I've got a kunch of documents here, but a number of these we're going to look at just 10 pricefly. 2 A. Okay. 3 Q. I have an outline, and given that e've a laiready asked - I've already asked you a number of documents and moving past them, so for everyone's sake, if I'm sitting here looking at my computer in space, we're myoning head, actually: I'm cutting stuff, just to let everyone know. In there a policy and procedure menual for the sheriff's office? 18 A. Yes. 19 Q. Ard has it been distributed to every employee of the sheriff's office? 19 A. Yes. 10 Q. Ard has it been distributed to every employee of the sheriff's office? 11 A. Yes. 12 A. Yes. 13 Q. Ard has it been distributed to every employee of the sheriff's office? 14 Q. Ard has it been distributed to every employee of the sheriff's office? 15 A. It is on line? 16 Q. Where is it on line? 17 A. Yes. 18 Q. Where is it on line? 19 A. In the webstite for each individual. 20 Q. And what does that near? 21 A. Each individual has their own small can be a continuous Exhibits throughout all of the depositions, you all of my cases. Decyyone has been nice enough to	4	Scott Dunn?	4	A. It's electronic.
7 ask you to see the invoices that Greenbrier had been 8 sending you? 9 A. No. 10 Q. All right. 11 A. I don't recall that. Can we take a break 12 Q. And did Mr. Durn ever ask? 13 Q. Sure. 14 THE MINNESS: I will be right back, excuse 14 did. 15 me. (A recess was taken.) 16 (A recess was taken.) 17 FY MR. SIREMA: 19 indicate, Sheriff, that Mr. Durn was terminated on or 20 around October 21, 2003 from the sheriff's office after he 17 had been terminated? 19 A. Wes. 20 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 10 triefly. 21 A. Okay. 22 A. Okay. 3 Q. I have an outline, and given that we've a already asked — I've already asked you a number of cocaments and moving past them, so for everyone's sake, if 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we've moving bead, actually: I'm cutting stuff, just to let the sheriff's office? 10 Q. Now had has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line. 16 Q. Rad what does that mean? 17 A. Yes. 18 Q. Mad what does that mean? 18 Page 101 A. No. 19 Q. No doay. 10 Q. All right, beer is your cough to manual for 10 Q. Do you recall what he was looking at my computer in space, we've moving bead, actually: I'm cutting stuff, just to let 20 Q. All right. Page 20 Q. Okay, but it is your testimony that Me. 20 Q. And has it been distributed to every 14 employee for the sheriff's office? 21 A. Yes. 22 A. Page 101 A. Yes. 23 Q. And has it been distributed to every 14 employee for the sheriff's office? 24 A. Yes. 25 Q. And has it been distributed to every 15 Q. All right. here is your copy, and I would be a complete to keep 15 A. It is on line. 11 A. Yes. 12 Q. And has it been distributed to every 13 Mr. Hunt to replace her. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 16 Q. It is an line? 17 A. Yes. 18 Q. Mare is it on line? 19 A. In the website for each individual. 20 Q. And what does that mean? 21	5	A. Someone who wanted to get out here and	5	Q. Okay. Did after the after this issue
8 sending you? 9	6	answer calls and do his work.	6	with Ms. Perkins and the animal shelter arose, did anyone
A. No. 10 Q. All right. A. I don't recall that. Can we take a break 12 for a second? 13 Q. Sure. 14 THE WITNESS: I will be right back, excuse 15 me. 16 G. All right, back on the Record, my records 17 ST MR. STREUA: 18 Q. All right, back on the Record, my records 19 indicate, Sheriff, that Mr. Dunn was terminated on or 20 around October 21, 2015 from the sheriff's office; does 21 that sound right to your, 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 25 but a number of these we're going to look at just 26 A. Gkay. 3 Q. I have an outline, and given that we've 4 already asked — I've already asked you a number of 5 questions and you've given me a bunch of anowers, I will 8 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually I'm outling stuff, just to let 10 everyore know. Is there a policy and procedure menual for 11 the sheriff's obgarnment? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line. 16 I'm sitting here looking at my computer in space, we're 17 mounting head, actually I'm outling stuff, just to let 18 Q. And has it been distributed to every 19 A. Jesse probably I could. A. Yes. 10 A. I'd is on line? 11 A. No. 12 A. No coe from the Board asked? 14 did. 15 In don't know if — I don't know if — I don't think that he 16 Information Act request to the sheriff's office after he 17 had been terminated? 18 A. Yes. 21 Q. Okay. Would you consider yourself to be 22 friends with Melvin Dalton or just professional 23 colleagues? 4 A. We're friends. 24 A. We're friends. 25 Page 19 26 A. We're friends. 27 Q. Of course, you would have the authority as 28 the sheriff's job? 29 A. I'm jeht, here is your copy, and I would 20 A. Yes. 30 Q. And has it been distributed to every 31 Mr. Hunt to replace her.	7	Q. Do you recall saying to him that "everyone	2 7	ask you to see the invoices that Greenbrier had been
10 Q. All right. 10 Q. No one from the Board asked? 11 A. No. 1 don't recall that. Can we take a break 12 Q. And did Mr. Durn ever ask? 13 A. I don't know if — I don't think that he 14 did. 15 MR. STEELKA: 16 (A recess was taken.) 16 (A recess was taken.) 17 BY MR. STEELKA: 17 MR. STEELKA: 18 Q. All right, back on the Record, my records 18 A. Yes. 19 Q. Do you recall what he was looking for? 19 Q. Do you recall what he was looking for? 19 Q. Do you recall what he was looking for? 20 A. Yes. 21 Q. Do you recall what he was looking for? 22 A. Yes. 23 Q. Mow, I've got a bunch of documents here, 23 Q. Mow, I've got a bunch of documents here, 24 Dut a number of these we're going to look at just 24 A. We're friends. 25 A. We're friends. 26 A. We're friends. 27 A. We're friends. 28 A. We're friends. 29 A. We're friends. 29 A. We're friends. 29 A. We're friends. 20 A. We're friends. 20 A. We're friends. 20 A. We're friends. 20 A. We're friends. 21 Q. Okay. We're friends. 22 A. We're friends. 23 A. We're friends. 24 A. We're friends. 25 A. We're friends. 26 A. We're friends. 27 A. We're friends. 28 A. We're friends. 29 A. We're friends. 29 A. We're friends. 29 A. We're friends. 29 A. We're friends. 20	8	in this department hates your F'ing guts"?	8	sending you?
11 A. I don't recall that. Can we take a break 12 for a second? 13 Q. Sure. 14 THE WITHERS: I will be right back, excuse 15 me. 16 (A receas was taken.) 17 BY MR. STREKA: 18 Q. All right, back on the Record, my records 19 indicate, Sheriff, that Wr. Durn was terminated on or 20 around Cotober 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 25 questions and you've given me a bunch of amseers, I will 26 productions and you've given me a bunch of sheerers, and you we given me a bunch of sheerers, and you've given we're moving head, actually: I'm outling stuff, just to let the sheriff's job; and you've given me a bunch of sheerers, and you've given me a bunch of sheerers, and you've given me a bunch of sheerers, and you've given we're yo	9	A. No.	9	A. No.
12 for a second? 13 Q. Sure. 14 THE WITNESS: I will be right back, excuse 15 me. 16 (A recess was taken.) 17 BY MR. STREAM: 18 Q. All right, back on the Record, my records 19 indicate. Sheriff, that Mr. Dunn was terminated on or 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 25 A. Okay. 26 A. Okay. 27 A. Okay. 28 Q. okay. 29 A. We're friends. 29 A. We're friends. 20 C. Kay, but it is your testinory that Ms. 20 A. We're friends. 21 that sound right to you? 22 A. We're friends. 23 colleagues? 24 A. We're friends. 25 Q. Okay, but it is your testinory that Ms. 26 A. The already asked you a number of guestions and you've given me a bunch of answers, I will probably be skipping chunks of this outline with these documents and moving past them, so for everyone's sake, if a l'm sitting here looking at my computer in space, we're moving head, actually: I'm cutting stuff, just to let the sheriff's department? 20 A. T is on line. 30 A. It is on line. 41 C. A. T is on line. 42 C. And has it been distributed to every encymor's sake, if the sheriff's department? 42 C. All right, here is your copy, and I would like the sheriff's department? 43 C. All right, here is your copy, and I would like the sheriff's department? 44 comployee of the sheriff's office? 45 A. T is on line? 46 C. All right, here is your copy, and I would like the website for each individual. 47 A. Yes. 48 C. A. We're friends. 49 C. Okay. 50 C. Okay. 51 D. Okay. 52 A. Me're friends. 53 Q. Okay. 54 A. We're friends. 55 Q. Okay. 56 A. Yes. 67 Q. Okay. 57 Q. Okay. 58 Q. Okay. 59 Q. Okay. 50 C. Okay. 51 D. Okay. 51 D. Okay. 52 A. We're friends. 53 Q. Okay. 51 D. Okay. 52 A. We're friends. 53 Q. Okay. 54 A. We're friends. 55 Q. Okay. 56 Q. Okay. 57 Q. Okay. 58 Q. Okay. 59 Q. Okay. 50 Q. Okay. 51 D. Okay. 51 D. Okay. 52 D. Okay. 53 Q. Okay. 54 D. Okay. 55 Q. Okay. 55 Q. Okay. 56 D. Okay. 57 Q. Okay. 58 A. Yes. 69 Q.	10	Q. All right.	10	Q. No one from the Board asked?
13	11	A. I don't recall that. Can we take a break	11	A. No.
14 THE WITNESS: I will be right back, excuse 15 me. 16 (A recess was taken.) 17 BY MR. STREIXA: 18 Q. All right, back on the Record, my records 19 indicate, Sheriff, that Mr. Dumn was terminated on or 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 24 A. Okay. 25 A. Okay. 26 A. Okay. 27 A. Okay. 28 A. Okay. 29 A. Okay. 20 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually: I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line? 16 Information Act request to the sheriff's office after he 17 had been terminated? 18 A. Yes. 20 Do you recall what he was looking for? 21 A. We're friends. 22 colleagues? 23 colleagues? 24 A. We're friends. 25 cleagues? 26 A. And professional colleagues. 27 A. And professional colleagues. 28 A. Yes, 29 C. Okay. 20 Ckay. 30 Q. Okay. 4 A. Yes repeated 4 A. Yes. 4 Perkins was hired by the sheriff's office before you took the sheriff's job? 5 department? 5 department? 6 C. Of course, you would have the authority as the sheriff to discontinue her employment at any time because she was under your supervision: is that right? 9 because she was under your supervision: is that right? 19 A. First on line? 10 A. Yes. 11 Q. All right. here is your copy, and I would time time the the sheriff's office? 11 Q. All right. 12 A. Feen know she worked for I could have the sheriff's office? 13 Q. Where is it on line? 14 Q. All right. here is your copy, and I would it like t	12	for a second?	12	Q. And did Mr. Dunn ever ask?
14 THE WITNESS: I will be right back, excuse 15 me. 16 (A recess was taken.) 17 BY MR. STREIXA: 18 Q. All right, back on the Record, my records 19 indicate, Sheriff, that Mr. Dumn was terminated on or 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 24 A. Okay. 25 A. Okay. 26 A. Okay. 27 A. Okay. 28 A. Okay. 29 A. Okay. 20 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually: I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line? 16 Information Act request to the sheriff's office after he 17 had been terminated? 18 A. Yes. 20 Do you recall what he was looking for? 21 A. We're friends. 22 colleagues? 23 colleagues? 24 A. We're friends. 25 cleagues? 26 A. And professional colleagues. 27 A. And professional colleagues. 28 A. Yes, 29 C. Okay. 20 Ckay. 30 Q. Okay. 4 A. Yes repeated 4 A. Yes. 4 Perkins was hired by the sheriff's office before you took the sheriff's job? 5 department? 5 department? 6 C. Of course, you would have the authority as the sheriff to discontinue her employment at any time because she was under your supervision: is that right? 9 because she was under your supervision: is that right? 19 A. First on line? 10 A. Yes. 11 Q. All right. here is your copy, and I would time time the the sheriff's office? 11 Q. All right. 12 A. Feen know she worked for I could have the sheriff's office? 13 Q. Where is it on line? 14 Q. All right. here is your copy, and I would it like t	13	Q. Sure.	13	A. I don't know if I don't think that he
16 Information Act request to the sheriff's office after he 17 BY MR. SIRELKA: 18 Q. All right, back on the Record, my records 18 A. Yes. 19 Q. Do you recall what he was looking for? 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just 24 A. We're friends. 25 A. We're friends. 26 A. And professional colleagues? 28 A. And professional colleagues? 29 A. And professional colleagues. 29 A. And professional colleagues. 29 A. And professional colleagues. 30 Q. Okay, but it is your testimony that Ms. 4 already asked I've already asked you a number of guestions and you've given me a bunch of answers, I will probably be skipping chunks of this outline with these 70 documents and moving past them, so for everyone's sake, if 8 A. Yes. 7 Q. Of course, you would have the authority as 6 A. Yes. 7 Q. Of course, you would have the authority as 8 the sheriff's discontinue her employment at any time 9 because she was under your supervision; is that right? 10 A. I guess probably I could. 11 Q. All right. A. Even know she worked for I could have 12 A. Yes. 7 Q. All right, here is your copy, and I would 18 Ilike this to be an Eshibit. Where did we end up last 18 A. Yes. 7 Q. All right. 19 A. In the website for each individual. 19 MR. GINN: Well, it will be marked as Millirons Deposition Exhibits . 20 MR. SIRELKA: I request that we do it in 20 All of my cases. Everyone has been nice enough to	14	THE WITNESS: I will be right back, excuse	14	
17 BY MR. STRELKA: 18 Q. All right, back on the Record, my records 19 indicate, Sheriff, that Mr. Dunn was terminated on or 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just Page 99 1 briefly. 2 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked — I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually: I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line. 16 Q. It is on line. 16 Q. It is on line? 17 A. Yes. 18 A. Yes. 19 Q. Okay. Mould you consider yourself to be 19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own email 22 M. STRELKA: I request that we do it in 23 G. Okay. 24 A. We're friends. Page 99 1 Q. Okay. 2 A. And professional colleagues. 3 Q. Okay, but it is your testimony that Ms. 4 Perkins was hired by the sheriff's office before you took 5 the sheriff's job? 6 A. Yes. 9 Q. Of course, you would have the authority as 8 the sheriff to discontinuour supervision: is that right? 9 because she was under your supervision: is that right? 10 Q. All right. 11 Q. All right. 12 A. Yes. 13 Q. Where is it on line? 14 Q. All right. Mere did we end up last 15 like this to be an Exhibit. Mere did we end up last 16 Implication of the depositions, you 17 A. Yes. 18 Q. Where is it on line? 19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own email 22 M. STRELKA: I request that we do it in 23 Millirons Deposition Exhibits.	15	me.	15	Q. Do you recall him ever sending a Freedom of
18 Q. All right, back on the Record, my records 19 Q. Do you recall what he was looking for? 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 21 A. Yes. 22 friends with Melvin Dalton or just professional 23 Q. Now, I've got a bunch of documents here, 23 colleagues? 24 A. We're friends. 26 friends with Melvin Dalton or just professional 27 Colleagues? 28 A. We're friends. 29 Colleagues? A. We're friends. 29 Colleagues? A. We're friends. 29 A. A. And professional colleagues. 29 A. A. And professional colleagues. 20 Okay, but it is your testimony that Ms. 4 already asked I've already asked you a number of guestions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these of documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually; I'm cutting stuff, just to let 9 because she was under your supervision; is that right? 10 A. Yes. 12 A. Yes. 12 A. Even know she worked for I could have 13 Mr. Hunt to replace her. 14 Q. All right, here is your copy, and I would 15 like this to be an Exhibit. Where did we end up last 16 time? I will tell you in two seconds. I want to keep 18 A. Yes. 19 A. Ti the website for each individual. 19 A. In the website for each individual. 19 A. Each individual has their own email 20 A. A. Each individual has their own email 21 Millirons Deposition Exhibits. 22 account. 23 Blocker. 24 A. Been show has encire that we do it in 25 Blocker. 25 A. Each individual has their own email 26 A. Seen Score, and I well in two seconds. I want to keep 18 A. Each individual has their own email 21 A. Each individual has their own email 22 A. Each individual has their own email 23 A. Each individual has their own email 24 A. Each individual has their own ema	16	(A recess was taken.)	16	Information Act request to the sheriff's office after he
19 indicate, Sheriff, that Mr. Durn was terminated on or 20 around October 21, 2013 from the sheriff's office; does 21 that sound right to you? 21 Q. Okay. Would you consider yourself to be 22 friends with Melvin Dalton or just professional 23 colleagues? 24 A. We're friends. Page 99 1 briefly. Page 99 1 briefly. Page 99 2 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually: I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line. 16 Q. It is on line? 16 Q. Where is it on line? 17 A. Yes. 17 A. Yes. 18 Q. Where is it on line? 18 Q. And what does that mean? 20 And what does that mean? 21 A. Each individual has their own email 22 A. Each individual has their own email 23 Q. Okay. 23 all of my cases. Everyone has been nice enough to	17	BY MR. STRELKA:	17	had been terminated?
around October 21, 2013 from the sheriff's office; does that sound right to you? A. Yes. Q. Now, I've got a bunch of documents here, but a number of these we're going to look at just Page 99 briefly. A. Okay. A. And professional colleagues. A. Yes. C. Okay. Dut it is your testimony that Ms. Berkins was hired by the sheriff's office before you took the sheriff's job? C. Okay. But it is your testimony that Ms. Berkins was hired by the sheriff's office before you took the sheriff's job? C. And has it been distributed to every the sheriff's office before your supervision; is that right? A. Yes. C. And has it been distributed to every the employee of the sheriff's office? A. It is on line. A. It is on line. C. All right. Here is your copy, and I would like this to be an Exhibit. Where did we end up last time? A. Yes. C. And has it been distributed to every the employee of the sheriff's office? A. It is on line? A. Yes. C. And has it been distributed to every the employee of the sheriff's office? A. It is on line? A. Yes. C. All right. Here is your copy, and I would like this to be an Exhibit. Where did we end up last time? I will tell you in two seconds. I want to keep continuous Exhibits throughout all of the depositions, you understand, sequentially, so we don't have seven Exhibit time? I will be marked as A. Each individual has their own email A. Each individual has been nice enough to	18	Q. All right, back on the Record, my records	18	A. Yes.
around October 21, 2013 from the sheriff's office; does that sound right to you? A. Yes. Q. Now, I've got a bunch of documents here, but a number of these we're going to look at just Page 99 briefly. A. Okay. A. Okay. A. Okay. A. Okay. A. Me're friends. Page 101 Driefly. A. Okay. A. And professional colleagues. A. A	19		19	Q. Do you recall what he was looking for?
22 A. Yes. 23 Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just Page 99 1 briefly. 2 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually! I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 15 A. It is on line. 16 Q. It is on line. 17 A. Yes. 18 Q. Where is it on line? 19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own enail 22 account. 23 Triends with Melvin Dalton or just professional 23 colleagues? 24 A. We're friends. Page 101 1 Q. Okay. 2 A. And professional colleagues. 3 Q. Okay, but it is your testimony that Ms. 4 Perkins was hired by the sheriff's office before you took 5 the sheriff's job? 6 A. Yes. 7 Q. Of course, you would have the authority as 8 the sheriff to discontinue her employment at any time 9 because she was under your supervision; is that right? 10 A. Even know she worked for I could have 11 Q. All right. 12 A. Even know she worked for I could have 13 Mr. Hunt to replace her. 14 Q. All right, here is your copy, and I would 15 like this to be an Exhibit. Where did we end up last 16 time? I will tell you in two seconds. I want to keep 17 A. Yes. 18 Q. Where si it on line? 19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own enail 22 Millions Exhibits. 23 Millions Deposition Exhibits. 24 D. We. STREIKA: I request that we do it in 25 All of my cases. Everyone has been nice enough to	20	around October 21, 2013 from the sheriff's office; does	20	A. I don't remember.
Q. Now, I've got a bunch of documents here, 24 but a number of these we're going to look at just Page 99 1 briefly. 2 A. Okay. 3 Q. I have an outline, and given that we've 4 already asked - I've already asked you a number of 5 questions and you've given me a bunch of answers, I will 6 probably be skipping chunks of this outline with these 7 documents and moving past them, so for everyone's sake, if 8 I'm sitting here looking at my computer in space, we're 9 moving head, actually: I'm cutting stuff, just to let 10 everyone know. Is there a policy and procedure manual for 11 the sheriff's department? 12 A. Yes. 13 Q. Okay, but it is your testimony that Ms. 4 Perkins was hired by the sheriff's office before you took 5 the sheriff's jobs? 5 the sheriff's jobs of the sheriff's office before you took 5 the sheriff's jobs? 6 A. Yes. 7 Q. Of course, you would have the authority as 8 the sheriff to discontinue her employment at any time 9 because she was under your supervision: is that right? 10 A. I guess probably I could. 11 Q. All right. 12 A. Yes. 13 Q. And has it been distributed to every 14 employee of the sheriff's office? 14 Q. All right, here is your copy, and I would 15 like this to be an Exhibit. Where did we end up last 16 time? I will tell you in two seconds. I want to keep 17 A. Yes. 18 Q. Where is it on line? 19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own email 21 Millirons Deposition Exhibits. 22 MR. SIRELKA: I request that we do it in 23 all of my cases. Everyone has been nice enough to	21	that sound right to you?	21	Q. Okay. Would you consider yourself to be
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19 A. In the website for each individual. 20 Q. And what does that mean? 21 A. Each individual has their own email 22 account. 23 Q. Okay. 29 Number 1's. 20 MR. GUYNN: Well, it will be marked as 21 Millirons Deposition Exhibits. 22 MR. STRELKA: I request that we do it in 23 all of my cases. Everyone has been nice enough to				
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21 A. Each individual has their own email 21 Millirons Deposition Exhibits. 22 account. 22 MR. STRELKA: I request that we do it in 23 Q. Okay. 23 all of my cases. Everyone has been nice enough to				
22 account. 23 Q. Okay. 22 MR. STRELKA: I request that we do it in all of my cases. Everyone has been nice enough to		~		
23 Q. Okay. 23 all of my cases. Everyone has been nice enough to				-
				_
21 11. They can part to up on the compacer and the 24 to that with me.	1 22	y. onay.	43	arr or my cases. Everyone has been nice enough to
		A They can pull it up on the computer and the	24 م	do that with me

BRIAN SCOTT DUNN vs SHERIFF MORGAN MILLIRONS Morgan Millirons on 04/07/2015

Pages 102..105

	Morgan Milliro	on 04/07/2015 Pages 102105	
	Page 102		Page 104
1	(Discussion off the Record.)	1	morning and, you know, they wanted them to be available
2		2	for everyone.
3	(The document was marked as Deposition	3	Q. Okay.
4	Exhibit Number 6 and entered into the Deposition.)	4	MR. GUYNN: So what Exhibit Number did we
5		5	decide on?
6	BY MR. STRELKA:	6	MR. STRELKA: That was 6.
7	Q. All right, this will be Exhibit Number 6.	7	(Discussion off the Record.)
8	Have you ever seen the minutes of a Board meeting at Giles	8	BY MR. STRELKA:
9	County before?	9	Q. That will be the procedure. He gets a copy
10	A. No.	10	but I hand a document to her, she hands the official one
11	Q. All right. I'd like to direct you to the	11	to you, you look at it, I ask you questions, and we're
12	second page of this document. I'd like you to look at the	12	done and you stick it there.
13	second paragraph. I'd like you to read that and tell me	13	A. Okay.
14	when you are finished. Have you read that second	14	Q. All right, do you recall a time when a new
15	paragraph?	15	sheriff's office was being constructed?
16	A. I have.	16	A. I remember when it was being talked about.
17	Q. Okay. Do you recall the date of this	17	Q. Okay. Did the so it was being discussed
18	document is October 2, 2013. Do you recall appearing at a	18	by the County whether or not they were actually going to
19	Board meeting on October 2, 2013 and discussing the issues	19	do the construction?
20	as indicated in this paragraph?	20	A. I hope it's going to be done.
21	A. I do.	21	Q. You hope it's going to be done, okay, and
22	Q. Okay. And do you recall if Mr. Dunn was	22	was there let me read you this sentence and you tell me
23	present on the Board at the time? It doesn't say in	23	if you agree with me or not. "The County paid roughly
24	here.	24	\$25,000 in preliminary work on this new sheriff's office
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1	Page 103 A. Well, he would have been during that time.	1	Page 105 and then the Sheriff changed his mind, creating a loss."
2	Q. Okay. And appearing at the Board to	2	Did that occur?
3	discuss these issues, did that upset you?	3	A. Do what?
4	A. No.	4	Q. "The County paid roughly \$25,000 in
5		5	preliminary work on the new sheriff's office and then the
			•
6	rules and regulations be put in place for volunteers to	6	Sheriff changed his mind." A. I don't recall that.
7	follow and ensure that they were followed;" were they?	7	
8	A. I think they were.	"	Q. Okay. And do you recall three years ago at
9	Q. But you don't know for sure?	9	a time when new portable radios were purchased by the
10	A. It wasn't long after that that the County	10	sheriff's office?
11	took them back over.	11	A. We buy radios quite often.
12	Q. Okay. How long after? I know you said	12	Q. Okay. Do you recall when you buy new
13	that you could not remember, but are we talking six	13	radios, do you recall what you do with the older radios
14	months, three months?	14	when they are replaced?
15	A. Maybe three or four months. I'm not really	15	A. They are sometimes they are sent down to
16	sure.	16	dispatch, and if they are not any good, you know, they
17	Q. Okay.	17	throw them away.
18	A. But I remember when they told them they	18	Q. And have you ever given any of these old
19	wanted them, in the morning and in the evening.	19	radios to private citizens who are not law enforcement
20	Q. Okay.	20	officials and not employees of the County?
21	A. I do remember that.	21	A. We have for the rescue squads.
22	Q. All right.	22	Q. Okay.
23	A. They wanted it to be occupied because the	23	A. And the fire department members.
24	people working the evening shift did not get there in the	24	Q. You give them to them?

BRIAN SCOTT DUNN vs SHERIFF MORGAN MILLIRONS Morgan Millirons on 04/07/2015

Pages 106..109

	Morgan Millirons on 04/07/2015 Pages 106109						
1	The select three her the december	Page 106	Page 108				
1	A. We give them to the depart	-	and I contacted a guy that an officer that used to work				
2	Q. For them to use in the con		2 for the sheriff's office, and he supposedly took these				
3	professional duties as a fireman or rescu		3 night vision goggles and he supposedly traded them for a				
4	A. Yes.		4 lawnmower or something, and we looked into this.				
5	Q. But you've never given an		5 We could not prove it, because everything				
6	was no longer to be used by the sheriff's	-	6 that we ever had any dealings with was present at the				
7	to a private individual?	'	7 sheriff's office, and I contacted David Fields and I asked				
8	A. No.	8					
9	Q. Have there ever been any		9 given a set of night vision goggles to that particular				
10	sheriff's office with missing firearms w	-	* '				
11	A. Yes, there was.	11	1 1 1				
12	Q. Okay, and what can you re						
13	incident?	13					
14	A. We had one to retire and		~				
15	missing.	15					
16	Q. Okay, and what kind of a	firearm was it? 16	6 that has gone missing?				
17	A. I think that it was a Glo	ck pistol. 17	A. No, we have two or three that are at the				
18	Q. And by "retire," what do	you mean by that? 18	8 sheriff's office.				
19	A. He left. He retired.	19	9 Q. And are you aware of one that was perhaps				
20	Q. Okay. The officer who use	ed that gun? 20	0 it might refresh your memory, that you know was bought				
21	A. Yes.	21	1 via a grant and that it can't be located currently?				
22	Q. Okay. And so what happen	ed to the 22	A. No, it is in my vehicle.				
23	firearm? You don't know?	23	3 Q. And are you using it for				
24	A. I don't know.	24	4 A. It is in my police car.				
		Page 107	Page 109				
1	Q. And did he so when this	s officer retired, 1	1 Q. Okay.				
2	are you aware of whether or not that gun	was left in the 2	2 A. And no, I have the night vision in my				
3	possession of the sheriff's office initia	ally? 3	3 police car; the thermal imaging is in Lieutenant Andy				
4	A. No, I'm not.	4	4 Metro's vehicle.				
5	Q. Okay. And the sheriff's	office, are they 5	5 Q. Okay. If I told you if I used the term				
6	required to keep paperwork on all of the	firearms within 6	6 "license plate reader," do you know what I'm referring				
7	its possession?	7	7 to?				
8	A. Yes.	8	8 A. I remember something about that, yes.				
9	Q. And do you recall what the	e paperwork 9	9 Q. Well, just forgetting any specifics, if you				
10	regarding this gun, this Glock you are re	eferring to, would 10	O could just tell me, what is a license plate reader? Is it				
11	indicate? I mean, where was the last known	own information 11	1 attached to your car?				
12	about this Glock?	12	2 A. It was in his vehicle.				
13	A. It was in his possession a	and I and, you 13	Q. Well, forget the one in his vehicle; just				
14	know, I don't know. I don't know if it's	s been returned or 14	4 educate me because I'm not a police officer, what is a				
15	not.	15	5 license plate reader?				
16	Q. All right.	16	6 A. I guess that it reads license plates. I				
17	A. As far as I know, we're no	ot missing any. 17	7 don't know.				
18	Q. Are you aware of any night	vision goggles 18	8 Q. Okay.				
19	that were in the possession of the sheri	ff's office that 19	9 A. I know that we have one on the grant.				
20	have been lost or turned up missing?	20	0 Q. Okay.				
21	A. That was brought to my at	tention a couple 21	1 A. And I don't know where it is at now.				
22	of years ago, that a pair of night vision	n goggles 22	Q. But there was an issue how does Mr. Dunn				
23	was missing, but we've checked our record	ds for our 23					
24	military equipment and everything and the		4 A. It was put in his vehicle.				

BRIAN SCOTT DUNN vs SHERIFF MORGAN MILLIRONS Morgan Millirons on 04/07/2015

Pages 110..113

1					
	Q.	Page 1 Okay, and was it removed from his vehicle		Q.	Page 112 And has that happened?
2	at some point	=	2	Α.	It did one time, and it should not have
3	Α.	I don't know.	3	happened.	
4	Q.	But currently, it can't be found?	4	Q.	Why is that?
5	Α.	Oh, I don't know.	5	Α.	Because we are under an agreement with the
6	Q.	Okay.	6	jail. These	inmates have to be under law enforcement
7	A.	I didn't know that it was missing.	7	supervision a	at all times.
8	Q.	What is is there an inmate work progra	n? 8	Q.	Okay.
9	A.	Yes.	9	A.	I mean, I can't be working them here and
10	Q.	And what is that?	10	you come up a	and say, well, I want to take three or four
11	A.	There is a program we started at the a	: 11	down the road	l here to do another job.
12	Giles County,	they are the it is a anywhere from s	ix 12	Q.	Okay.
13	to eight inma	tes that are worked periodically through th	e 13	A.	They have to be supervised by everyone, by
14	week and some	times on the weekends and they are under a	14	somebody that	is a law enforcement agent.
15	guard, and the	ey perform various duties for the County, y	ou 15	Q.	Okay.
16	know, mowing,	digging ditches, laying block, brick, doin	g 16	A.	Or a correctional officer
17	tile work in	the school systems. They paint, they prune	17	Q.	All right.
18	trees, trim b	ushes, whatever needs to be done.	18	A.	representing the Giles County sheriff's
19	Q.	And the sheriff's office oversees these	19	office.	
20	inmates perfo	rming the work?	20	Q.	All right.
21	A.	No, the County does. Well, the County pa	/s 21	A.	Now, if somebody from the jail wants to
22	for everythin	g and we have a there is what we use now	; 22	come, I guess	that would be okay because we have a crew
23	there is the	jailers from the New River Valley Regional	23	that comes ov	ver from the jail that is supervised by a
24	Jail at Dubli	n.	24	correction of	ficer.
		Dec. 1	11		D 112
1	Q.	Page 1 Okay. But as far as how this work is to		Q.	Page 113 Okay. Prior to being elected sheriff,
2	performed, do	es your office have any sort of authority t	2	where were yo	
3	_	is work is being performed? I mean, like,	3	Α.	Virginia Tech Police.
4		would inmates do work out in the public?	4	٥.	And how long did you work there?
5		iff's office ever you say that it's	5	Α.	I think 13 years.
6		ng it, but does the sheriff's office ever	6	Q.	And did you ever have a discussion with
7	-	prity over this?	7		out what Mr. Dunn's role might be if you were
8	Α.	They are the sheriff's office, we	8	elected sheri	
9		nave the jailers.	9	A.	Yes.
10	Q.	Are they	10	Q.	What did you say?
11	A.	They are deputies.	11	Α.	We talked about him coming to work for me,
12	Q.	Okay.	12	possibly bein	ng a chief deputy.
13	Α.	But as far as the work, no.	13	Q.	But he never became a chief deputy?
14	Q.	Okay.	14	Α.	No.
15	Α.	The County tells them what they need to d	15	Q.	Did you talk to Joe Shanks about that, too,
16	and they do th		16	before being	•
17	Q.	Okay.	17	Α.	About being chief deputy?
18	Α.	Because I would not know the first thing	18	Q.	Yes.
19		them how to finish concrete and things lik		Α.	No.
20	that.		20	Q.	Anybody else?
1	Q.	Okay. And have you ever been requested t		Α.	Mike Falls.
21		king performed by these inmates into two	22	Q.	And so you picked Mike over Scott?
21 22	philic rife work	ting periorited by chebe intaces into ewo			
	crews?	ting performed by these limited lines two	23	Α.	Yes.

Pages 114..117

The Board about her pay issues, her salary? A. I don't know. She might howe. I think I a salad to belay supplement her pay, you know, give her a little bit more money a time or two. O. Chay. All right, I'm just going to sepressant some information to you. I'm holdsing a document in from: of the deponent, and I will represent to you that these are Board minutes. I'm gening to reads a section from it and them said if you have any knowledge or you agree or disagree. This is about the date by which the County took over the shelter. A. Chay. A. Chay. A. Chay. A. Chay. A. Wes. A. After everything had been taken care of, the procedures provided for the shelter, animal control, the procedures provided for the shelter, animal control, the procedures provide any comments. Be related the Control had samed responsibility of animal control, the provides any comments. Be related the Control had samed responsibility of animal control on the pay of the control took. The shows mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 7 and entered into the Deposition. The shows—mentioned document was marked as Deposition Exhibit Marker 8 and entered into the Deposition. The shows—ment the bittle of the shelter, was a fire the should be a pay board member? The shows—mentioned document was marked as Deposition Exhibit Marker 9 and entered into the Deposition. The shows—mentioned document was ma		Worgan Willing		ni 04/07/2015 1 ages 114117
a saked to help supplement her pay, you know, give her a saked to help supplement her pay, you know, give her a consequent at time or two. G. Gkay, All right, I'm just going to the inference of degeneral, and I will represent you that in front of the degeneral, and I will represent you want it and then saked flyou have any knowledge or you agree or disagree. This is about the date by which the County took in country took in procedures provided for the shalter, animal control, in any way and the procedures provided any comments. The related the force and provide any comments, it re related the force and provide any comments, it re related the force and provide any comments. The related the force and provide any comments, it re related the force and provide any comments, it re related the force and provide any comments, it re related the force and provide any comments. The related the force and provide any comments, it re related the force and provide any comments, it re related the force and provide any comments. The related the force and provide any comments, it re related the force and provide any comments, it re related the force and provide any comments. The related the force and provide any comments, it re related the force and provide any comments. The related the force and provide any comments is related the force and provide any comments. The related the force and provide any comments and pr	1		1	
a saked to help supplement her pay, you know, give her a 4 little bit more morey a time or two. 5				be Emiliate Number 0, prease.
4 Deposition Déhibit Number 8 and entered into the 5 Deposition Déhibit Number 8 and entered into the 5 Deposition.) 4 Deposition Déhibit Number 8 and entered into the 5 Deposition. Stripe were now plant and then ask if you have any knowledge or you agree or 10 disagree. This is about the date by which the County took 11 over the shelter. 2 A. Ckey. 3 D. Wr. McKlamey repeated members to review the procedures provided for the shelter, animal control. 14 and volunteers and provide any comments. Se related the 16 County bad assumed responsibility of animal control. 15 and volunteers and provide any comments. Se related the 16 County had assumed responsibility of animal control. 16 It may be, but I don't know. 3 PMS. STREILEA: Ckey. All right. This is a letter that I would like to be entered as Eshibit Number 7. 4 Page 115 (The above-mentioned document was marked as Deposition.) 5 Page 117 (The above-mentioned document was marked as Peposition.) 6 Deposition Déhibit Number 7 and entered into the 3 peposition Déhibit Number 7 and entered into the 3 written by you, Sheriff, but I want to know if you ever 9 rend this before. 9 Page 117 10 O. Now, Mr. Millifrons, this letter is not addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 rend this before. 10 Now, Mr. Millifrons, this letter is not addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 rend this before. 10 Now, Mr. Millifrons, this letter is not addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 rend this before. 10 Now, American Page 10 Now, Mr. Millifrons, this letter is not addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 Page 117 12 A. Yes. 13 D. Boy of idition this letter the first time? 14 A. This cone here (indicating)? 15 A. Be the this first that you as each of the document was marked as		_		(The above-mentioned document was marked as
5 Deposition.) 6 represent some information to you. I'm holding a document. 7 in from of the deponent, and I will represent to you have. 8 these are Board minutes. I'm going to read a section from 9 it and then ack if you have any knowledge or you agree or 10 disagree. This is about the date by which the County took 11 over the shelter. 12 A. Goay. 13 Q. "Mr. McKlarney requested members to review. 14 the procedures provided for the shelter, animal control., 15 and volunteers and provide any comments. He related the 16 County had assamed responsibility of animal control on 17 August 15," and that would be of 2014; does that sound 18 right to you? 19 A. I thought they did it earlier than that. 20 It may be, but I don't know. 21 Mr. STEELZA: Goay. All right. This is a 22 letter that I would like to be entered as Eshibit. 23 Mr. STEELZA: Goay. All right. This is a 24 letter that I would like to be entered as Eshibit. 25 Mr. STEELZA: Goay. All right. This is a 26 letter that I would like to be entered as Eshibit. 27 Mr. STEELZA: Goay. All right. This is a 28 peposition Eshibit Namber 7. 29 Mr. STEELZA: Goay. All right. This is a 29 Q. Have you ever seen this before? 20 Q. All right. 21 A. He said things were - you know, needed to be fixed, and then thoy were fixed. 22 Q. Cleay. So as far as you are concerned from your perspective, all of the issues that were impacting 29 Q. Now, Mr. Millirons, this letter is not of addressed to you and it does not indicate that it was written by you, Smarlf, but I want to know if you ever your perspective, all of the issues that were impacting. 29 A. This one here (indicating)? 30 A. When it came out. 40 Cleay. 50 A. When it came out. 51 Cleave were - everything was fine. The hours that they wented the shelter was heiny manned the way that the County wanted it. 51 Deposition. 52 A. When it came out. 53 Deposition Eshibit Number 9 and entered into the barbot when the work of your receive a copy of it? Was a copy emailed to you? 53 A. I think that there was a copy emailed. I. 64 O. Ok				
6 represent once information to you. I'm holding a document 7 in front of the depocent, and I will represent to you that 8 these are Board minutes. I'm going to read a section from 9 it and then ask if you have any knowledge or you agree or 10 disagree. This is about the dute by which the County took 10 core the shelter. 12 A. Oksy. 13 Q. We. McKlarmey requested members to review 14 the procedures provided any comments. He related the 15 County had assumed responsibility of animal control on 18 right to you? 19 A. I thought they did it earlier than that. 10 It may be, but I don't know. 11 Mnmber 7. 12 MR. STEELEA: 13 A. Yes. 14 Q. We. McKlarmey requested members to review 14 the procedures provided any comments. He related the 15 County had assumed responsibility of animal control on 18 right to you? 19 A. I thought they did it earlier than that. 20 It may be, but I don't know. 21 MR. STEELEA: 22 Q. And what is it? 11 A. After everything had been taken care of. 14 Q. And did you ever go over this report with 15 any Board member? 16 Q. All right. 17 a. A I think that Chris McKlarmey talked about 18 it. 20 Q. All right. 19 A. I think that Chris McKlarmey talked about 19 it. 21 A. He said things were — you know, needed to 22 be fixed, and then they were fixed. 23 Q. Oksy. So a far as you are concerned from 24 your perspective, all of the issues that were impacting 25 personal to you and it does not indicate that it was 26 written by you, Sheriff, but I want to know if you ever 27 read this before. 28 when did you read this letter the first time? 29 read this before. 30 Q. Bow did this — how did you — excuse me, 31 Letter that I would be maken care of the dors, and a far as I know, the shelter was being 31 manned the way that the County wanted it. 32 Q. Bow did this — how did you — excuse me, 33 Q. Deposition. 34 A. Yes, they were — everything had been taken care of the dors, and a far as I know, the shelter was being 35 manned the way that the County wanted it. 36 manned the way that the County wanted it. 37 Q. De		-		-
7 in front of the deponent, and I will represent to you that 8 these are Board minutes. I'm going to read a section from 9 it and then ask if you have you congree or 10 disagree. This is about the date by which the County took 11 over the shelter. 12 A. Okay. 13 Q. 'Mr. McKlarney requested members to review 14 the procedures provided for the shelter, animal control, 15 and volunthears and provide any comments. He related the 16 County had assumed responsibility of animal control on 17 August 15, 'and that would be of 2014' does that sound 18 right to you? 19 A. I thought they did it earlier than that. 20 It may be, but I don't know. 21 letter that I would like to be entered as Rabibit. 22 letter that I would like to be entered as Rabibit. 23 Number 7. 24 Page 115 25 Page 115 26 (The above-mentioned document was marked as 27 Deposition. Exhibit Number 7 and entered into the 28 pagestion.) 29 A. This one here (indicate that it was 30 written by you, Shariff, but I want to know if you ever 31 Page 115 4 Page 115 5 PF MR. SIRBIKA: 4 Q. Naw, Mr. Millirons, this letter is not. 5 Pr MR. SIRBIKA: 5 PR MR. SIRBIKA: 6 Q. Naw, Mr. Millirons, this letter is not. 7 addressed to you and it does not indicate that it was 8 written by you, Shariff, but I want to know if you ever 9 read this before. 10 A. This one here (indicating)? 11 Q. Yee, gir. 12 Q. How did this — how did you — excuse me, 13 Q. How did this — how did you reactive a copy of it? Was a copy emailed to you? 15 A. When it came out. 16 Q. All right. 17 A. After cerepthing had been taken curs of . 18 Q. Way I shariff, but I want to know if you ever 19 A. I think that there was a copy enalled. I a population Deposition Exhibit Number 9 and encered into the 19 Page 117 19 Q. Do you recognize the document that has been pleased in front of you? 20 A. I think that there was a copy enalled. I 21 C. And is that your signature at the botton? 22 A. I think that there was a copy enailed. I 23 A. Yes. 24 Q. Gkay. Is this a letter that botton? 25 PF MR. SIRBIKA: 26 A. I think				DEPOSITION.)
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20 It may be, but I don't know. 21		5 • • • • • • • • • • • • • • • • • • •	-	- 1
21 MR. STREIKA: Okay. All right. This is a letter that I would like to be entered as Exhibit 22 Mumber 7. 23 Mumber 7. 24 Page 115 25 Page 115 26 (The above-mentioned document was marked as Deposition.) 27 Deposition. 28 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 21 Deposition. 22 Deposition. 23 A. Yes, they were cosmetic. 24 Q. Okay. 25 BY MR. STREIKA: 26 Q. Now, Mr. Millirons, this letter is not addressed to you and it does not indicate that it was written by you, Sheriff, but I want to know if you ever read this before. 29 read this before. 20 A. This one here (indicating)? 20 A. Whow did this how did you excuse me, when did you read this letter the first time? 21 A. When it came out. 22 Deposition. 23 A. He said things were you know, needed to be fixed, and then they were fixed. 24 your perspective, all of the issues that were impacting. 25 Deposition. 26 Deposition. 27 Deposition. 28 Deposition. 29 A. When it came out. 20 A. When it came out. 20 A. I think that there was a copy emailed. I Deposition. 21 Deposition. 22 Deposition. 23 A. He said things were you know, needed to be fixed, and then they were fixed. 26 Deposition. 27 Deposition. 28 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 21 Deposition. 22 Deposition. 23 Deposition. 24 Deposition. 25 Deposition. 26 Deposition. 27 Deposition. 28 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 21 Deposition. 22 Deposition. 23 Deposition. 24 Deposition. 25 Deposition. 26 Deposition. 27 Deposition. 28 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 21 Deposition. 22 Deposition. 23 Deposition. 24 Deposition. 25 Deposition. 26 Deposition. 27 Deposition. 28 Deposition. 29 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 21 Deposition. 22 Deposition. 23 Deposition. 24 Deposition. 25 Deposition. 26 Deposition. 27 Deposition. 28 Deposition. 29 Deposition. 20 Deposition. 20 Deposition. 20 Deposition. 20				
22 letter that I would like to be entered as Exhibit 23 Number 7. 24 Page 115 1 (The above-mentioned document was marked as 2 befixed, and then they were fixed. 24 your perspective, all of the issues that were impacting Page 115 1 (The above-mentioned document was marked as 2 beposition Exhibit Number 7 and entered into the 2 back over? 3 Deposition.) 4 Q. Okay. 5 BY MR. STREIKA: 6 Q. Now, Mr. Millirons, this letter is not 7 addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 read this before. 9 read this before. 10 A. This one here (indicating)? 11 Q. Yes, sir. 12 A. Yes. 12 A. Yes. 13 Deposition Exhibit Number 9, please. 14 Deposition Exhibit Number 9 and entered into the 10 Exhibit Number 9, please. 15 A. When it came out. 16 Q. All right. 17 A. And this was after the inspection. 18 Q. Sure, and how did you receive a copy of 19 it? Was a copy emailed to you? 19 it? Was a copy emailed to you? 20 A. I think that there was a copy emailed. I 20 Q. Okay. 21 A. Yes. 22 Q. And is that your signature at the bottom? 23 A. Yes, they were cosmetic. 4 Q. Okay. 5 A. And they were everything was fine. The 6 hours that they wanted the shelter governed was placed on 7 the door, and as far as I know, the shelter was being 8 manned the way that the County wanted it. 9 MR. STREIKA: I would like this to be 10 Exhibit Number 9, please. 11 Deposition Exhibit Number 9 and entered into the 12 Deposition.) 12 A. Wes. 13 Deposition Exhibit Number 9 and entered into the 14 Deposition.) 14 Deposition Exhibit Number 9 and entered into the 15 Deposition Exhibit Number 9 and entered into the 16 Deposition.) 15 A. I think that there was a copy enailed. I 20 Q. Okay. Is this a letter that you sent? 18 A. I think that there was a copy enailed. I 20 Q. And is that your signature at the bottom? 29 A. I think that there was a copy enailed. I 20 Q. And is that your signature at the bottom?				-
23 Q. Okay. So as far as you are concerned from 24 your perspective, all of the issues that were impacting Page 115 (The above-mentioned document was marked as 2 Deposition. Exhibit Number 7 and entered into the 3 Deposition.) BYMR. STREIKA: Q. Now, Mr. Millirons, this letter is not 4 dadressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 read this before. A. This one here (indicating)? A. Yes. Q. How did this how did you excuse me, 14 when did you read this letter the first time? A. When it came out. Q. All right. A. And this was after the inspection. A. Mine it came out. Q. Sure, and how did you receive a copy of 19 it? Was a copy emailed to you? A. I think that there was a copy emailed. I 20 Q. Okay. A. I'm not sure, but I think so. 23 Q. Okay. So as far as you are concerned from 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 24 your perspective, all of the issues that were impacting 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County took it 2 back over? 1 the shelter were fixed at the time that the County and the way that				-
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3 A. Yes, they were cosmetic. 4 Q. Okay. 5 BY MR. STRELKA: 6 Q. Now, Mr. Millirons, this letter is not 7 addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 read this before. 9 MR. STRELKA: 1 would like this to be 10 A. This one here (indicating)? 10 Exhibit Number 9, please. 11 Q. Yes, sir. 11 12 A. Yes. 12 (The above-mentioned document was marked as 13 Q. How did this how did you excuse me, 14 Deposition.) 15 A. When it came out. 15 16 Q. All right. 16 BY MR. STRELKA: 1 17 A. And this was after the inspection. 17 Q. Do you recognize the document that has been 18 Q. Sure, and how did you receive a copy of 19 it? Was a copy emailed to you? 19 A. I think so. 10 Nay. 23 A. Yes. 20 Q. And is that your signature at the bottom? 23 A. Yes. 20 Q. And is that your signature at the bottom? 23 A. Yes. 20 Q. And is that your signature at the bottom? 25 A. Yes. 20 Q. And is that your signature at the bottom? 25 A. Yes. 20 Q. And is that your signature at the bottom? 26 A. I'm not sure, but I think so. 20 A. I'm not sure, but I think so. 20 A. I'm not sure, but I think so. 20 A. Yes. 20 A. Yes.				-
4 Q. Okay. 5 BY MR. STREIKA: 6 Q. Now, Mr. Millirons, this letter is not 7 addressed to you and it does not indicate that it was 8 written by you, Sheriff, but I want to know if you ever 9 read this before. 9 MR. STREIKA: I would like this to be 10 A. This one here (indicating)? 11 Q. Yes, sir. 12 A. Yes. 13 Q. How did this how did you excuse me, 14 when did you read this letter the first time? 15 A. When it came out. 16 Q. All right. 17 A. And they warted the shelter governed was placed on 7 the door, and as far as I know, the shelter was being 8 manned the way that the County wanted it. 9 MR. STREIKA: I would like this to be 10 Exhibit Number 9, please. 11 Deposition Exhibit Number 9 and entered into the 14 Deposition.) 15 Deposition Exhibit Number 9 and entered into the 16 BY MR. STREIKA: 17 Q. Do you recognize the document that has been 18 Q. Sure, and how did you receive a copy of 19 it? Was a copy emailed to you? 19 A. I think that there was a copy emailed. I 20 Q. Okay. Is this a letter that you sent? 21 think that Chris McKlarney also sent me one by email. 22 Q. Okay. 23 A. I'm not sure, but I think so. 24 Q. And is that your signature at the bottom? 25 A. Yes.		_		
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1	Page 118 Exhibit Number 10.	1	Page 120 should respond
2	EATHDIC Number 10.	2	A. Yes.
3	(The above-mentioned document was marked as	3	Q to the Department of Agriculture's
4	Deposition Exhibit Number 10 and entered into the	4	A. Yes.
5	Deposition.)	5	Q. All right.
6	Deposition. (6	A. I remember this now.
7	BY MR. STRELKA:	7	Q. All right.
8	Q. Did you ever see this letter before? I	8	A. This is the one where he's talking about
9	know that it does not purport to be written to you or by	9	the video surveillance camera and a time clock.
10	you, but I'm curious as to whether you've ever seen it	10	Q. So at the time that this letter was sent,
11	before.	11	you would have had you are saying that you would have
12	A. I think so.	12	had discussions with Mr. McKlarney about some of the issue
13	Q. Okay, do you recall ever having any	13	presented in here; is that right?
14	discussions with any Board members regarding this letter?	14	A. Yes.
15	A. This is when we were talking about putting	15	Q. Okay.
16	the time clock the time clock and the camera there.	16	A. Yes, I remember this now.
17	That way we could have proof that the shelter was being	17	MR. STRELKA: Okay. This will be 12.
18	occupied.	18	
19	Q. Okay.	19	(The above-mentioned document was marked as
20	A. And the animals were not left over 24	20	Deposition Exhibit Number 12 and entered into the
21	hours.	21	Deposition.)
22	Q. Okay. And do you recall ever having a	22	
23	discussion with the Plaintiff about that letter?	23	BY MR. STRELKA:
24	A. No. I don't think so.	24	Q. I will represent to you that in the course
	Page 119		Page 121
1	MR. STRELKA: All right. Let's mark this	1	of discovery in this case, we've got this letter that
2	as Number 11.	2	indicated that she wrote it. I know that you are not
3		3	Chastity Perkins, but have you ever seen this before?
4	(The above-mentioned document was marked as	4	A. Yes.
5	Deposition Exhibit Number 11 and entered into the	5	Q. And do you know why this letter was
6	Deposition.)	6	written?
7		7	A. I think she was wanting more money.
8	BY MR. STRELKA:	8	Q. Okay. And how did you
9	Q. I will represent to you this is a	9	A. I think.
10	response this is a letter response from the Board of	10	Q. How did you get to be able to see this
11	Supervisors to the Department of Agriculture. Did you	11	letter? When did you see it?
12	ever discuss with any Board member the drafting of this	12	A. I think she gave it to me.
13	letter? A. Wait a minute here.	13	Q. Okay. And
14		15	A. I'm thinking.
15 16	Q. All right. A. Is this the one here that you are asking	16	Q. Okay. Why would she have given it to you? A. I think that I quess she wanted me to go
17	about?	17	to the Board and ask for more money. I believe that this
18	Q. I'm asking about Exhibit Number 11.	18	is what I'm thinking about here.
19	A. Okay.	19	Q. So you recall a conversation with Ms.
20	Q. First of all, have you ever read this	20	Perkins in which she indicated that she wanted more money?
21	letter before; have you ever seen it?	21	A. She told me one or two times, you know,
22	A. I'm not sure.	22	that she had been doing the same job for the same amount
23	Q. Okay. And did you ever have any	23	of money and never did receive a raise.
24	discussions with Chris McKlarney about how the Board	24	Q. Okay. And did you instruct Ms. Perkins to
			x

	Mulgan M	11111 0113	011 04/07/2013 1 ages 122123
1	Paş write this letter?	ge 122	Page 124 A. I do.
2	A. I don't think so.	2	Q. And let's look at this second paragraph.
3		3	
	Q. All right.		It says, "First, your budget currently has funding for two
4	A. But I did tell her to contact the Boar		full-time animal control officers, however, one full-time
5	Q. Okay.	5	position currently exists." Would you agree with that
6	A. And I'm thinking that I contacted the		statement?
7	as well.	7	A. Yes, at the time.
8	Q. All right. So you contacted the Board		Q. Okay. And so the one full-time was Melvin
9	behalf of Ms. Perkins?	9	Dalton; is that right, the one full-time?
10	A. Yes, to get her some more money.	10	A. At this time here it was probably Jeff.
11	Q. Okay.	11	Q. Spicer?
12	A. Wait a minute, this is not the one tha		A. Spicer.
13	was thinking about.	13	Q. And so one full-time, we have Mr. Spicer?
14	MR. STRELKA: This will be marked as	14	A. Yes.
15	Exhibit 13, please.	15	Q. And then we have our part-time guy, Mr.
16		16	Gough?
17	(The above-mentioned document was mark	ed as 17	A. At the time it was Frank Gough.
18	Deposition Exhibit Number 13 and entered into	the 18	Q. Okay.
19	Deposition.)	19	A. And one was being used as a road deputy.
20		20	Q. That is what I was going to ask. The funds
21	BY MR. STRELKA:	21	that were begin given for these full-time animal control
22	Q. We're on to another Exhibit, sir.	22	officers, where were the funds, because you weren't
23	A. Okay.	23	utilizing two full-time animal control officers, where
24	Q. I'm not going to ask you any more ques	tions 24	were the funds that were extra going, that were left over?
	Do	TO 122	Page 125
1	about that.	ge 123	A. They were being utilized as a road deputy.
2	A. Okay.	2	What are you talking about, left over from?
3	Q. Have you ever seen this letter?	3	Q. Okay, so here we have Chris McKlarney
4	A. Yes.	4	stating in a statement that you agreed to, first your
5	Q. Okay. And do you know why Mr. Hunt wr	ote 5	budget currently has funding for two full-time animal
6	this letter?	6	control officers?
7	A. I think that I may have contacted him.	7	A. Yes.
8	Q. Okay. And requested that he write thi	s 8	Q. All right. And where does the funding come
9	letter?	9	from your budget?
10	A. And told him that, you know, the Board		A. The Board of Supervisors.
11	asked me about, you know, the hours she was working.	11	Q. The County?
12	Q. Okay.	12	A. The County.
13	A. And he wrote this letter.	13	Q. Okay, and so the County has given the
14	Q. And you provided this letter to the Bo		sheriff's office money for two full-time animal control
15	A. Yes.	15	officers, but we know that the sheriff's office does not
16	MR. STRELKA: All right. I will ask t		employ two, right?
17	this be marked as Exhibit Number 14.	17	A. Yes.
18	CALLO DO MALINO CO LIMILIDAD MUNICI 17.	18	Q. So there would be money left over in the
19	(The above-mentioned document was mark		budget because you weren't employing two full-time animal
20	Deposition Exhibit Number 14 and entered into		control officers?
	_		
21	Deposition.)	21	A. Right; I was utilizing one as a field
22	DV MD CUIDEI IZA	22	deputy
23	BY MR. STRELKA:	23	Q. All right.
24	Q. Do you recall receiving this letter?	24	A that was working a shift.

Table Tabl		Willigan Willing		JII 04/07/2013 1 ages 120129
2 were using this money for west going to a road deputy? 3 A. Yes. A. Yes. O. Gray. And did you have the suthority to the what chat decision? A. I saked the Board of Supervisors if I could be because it is a closed meeting. A. It was - I helieve that it was February of O. Stem? O. Meen? D. Oday. A. The same time that I asked about the I eleftower funding. A. The same time that I asked about the I eleftower funding. A. The same time that I asked about the I eleftower funding. O. Gray. And so if this is in 2014, this I letter, why - if that is - if that meeting existed and I that decision was made in 2008, why did the budget never change? I A. I don't know. O. All right. A. I don't know as a rise of the subget set redone for the what if a same in 2008, why did the budget never change? A. I meer did have but one full-time minul control officer. Page 17 A. Free 2008 until I guess last year. A. I guess they could, hat I saked them if I could utilize that one person as a field deputy and they and employ toe full-time minul control officers, done the B. Samot have the authority to direct you to do that? A. I guess they could, hat I saked them if I could utilize that one person as a field deputy and they and adalyes. A. I guess they could, hat I saked them if I could utilize that one person as a field deputy and they and adalyes. A. I guess they could, hat I saked them if I could utilize that one person as a field deputy and they and employ toe full-time minul control officers, done the B. Samot have the authority to direct you to do that? A. I guess they could, hat I saked them if I could utilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that one person as a field deputy and they B. Sibilize that the firm individua	1			9
4 Ciffe above-mentioned document was marked as Deposition Deposition			2	-
4 Ciffe above-mentioned document was marked as Deposition Deposition			3	
5 make that decision? 6 A. I asked the Board of Supervisors if I could 7 do that in a closed meeting. 7 Numer 8 Q. When? 9 A. It was I believe that it was February of 10 2008. 11 Q. Gksy. 12 A. The same time that I asked about the 13 leftower funding. 13 leftower funding. 14 Q. How often does the budget get redone for 15 the sheriff's officer 15 A. Bo. 16 Mem. STREEZA: Cksy. This is a two-page 17 Q. Gksy. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 24 central officer. 25 Page 127 2 A. Prom 2000 until I guess last year. 3 Q. If the Board has given you money to utilize 4 and employ two full-time animal control officers, does the 8 Board have the authority to differey not do that? 8 FY MR. STREEZA: 26 A. I guess they could, but I asked then if I 7 could utilize that compersom as a field deputy and they 28 said yes. 3 Q. All right. 4 O. All right. 5 Q. All right. 6 A. I guess they could, but I asked then if I 7 could utilize that compersom as a field deputy and they 28 said yes. 4 Prom 2001 have given no permission. 4 Page 200 him above—emptioned document was marked as 4 Page 201 him above it, but I don't remember ever sending an email. 5 (The above—emptioned document was marked as 8 Page 201 him above it, but I don't remember ever sending an email. 7 Page 129 8 FY MR. STREEZA: 8 Page 201 him and he said, I think that you've been fed poison. 8 Page 202 him and the said, I think that you've been fed poison. 8 Page 203 him and he said, I think that you've been fed poison. 9 Q. Have you ever seen this letter? 19 A. A and he said, please don't take one person's thoughts from everyboyt that wants to help. 9 Q. Have you ever seen this letter? 19 A. Page 202 have the thing that here it says, years the could have it was the said where it says, years the could have given no permission. 9 Q. Have you ever seen this letter				(The above-mentioned document was marked as
6 A. I asked the Board of Supervisors if I could 7 do that in a closed meeting. 8 Q. When? 9 A. It was I believe that it was Pebruany of 10 2008. 11 Q. Glosy. 12 A. The same time that I asked about the 13 leftower funding. 14 Q. How often does the hudget get redone for 15 the sheriff's office? 16 A. Each year. 17 Q. Glosy. 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal control officer. 24 control officer. 25 Page 127 26 A. From 2008 until I guess last year. 27 Q. All right. 28 and employ the full-time animal control officers, does the act and play to full-time animal control officers, does the same play that I asked them if I could willise that one person as a field deputy and they said yea. 29 Q. All right. 30 Q. All right. 40 A. I guess they could, but I asked them if I could willize that one person as a field deputy and they said yea. 41 Mexicarney? 42 A. I rever did have given no permission. 43 In the said that I was Pebruany to Mexicarney and Re. Balton? 44 C. Control officer. 45 Board have the authority to direct you to do that? 46 A. I guess they could, but I asked them if I could willize that one person as a field deputy and they said yea. 48 A. I wouldn't have done something like that I miless they would have given no permission. 49 Q. All right. 50 A. I wouldn't have done something like that I miless they would have given no permission. 51 A. I would willize that one person as a field deputy and they said yea. 52 Q. All right. 53 A. I would willize that one person as a field deputy and they said yea. 54 Q. Was did be say? 55 A. I would willize that one person say the said downer was marked as please. 56 Peposition. You was per eri in the seail. 57 Q. Was did be say? 58 A. I'm thinking that Charlie Herbert did, but I'm not sure. 59 Q. All right. 50 Q. Was did be say? 50 Q. Was did be none by that? 51 A. He told none one day, be said		~	5	,
do that in a closed secting. Note 1		A. I asked the Board of Supervisors if I could	6	_
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A. It was — I believe that it was February of 10 2008. 10 A. The same time that I asked about the 12 it. 13 leftower funding. 2 How often does the budget get redone for 15 the sheriff's office? 15 the sheriff's office? 16 A. Bach year. 17 Q. Gkay, And so if this is in 2014, this 18 letter, why — if that is — if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 chappe? 20 chappe? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 22 control officer. 24 Prom 2008 until I guess last year. 3 Q. If the Board hase given you money to utilize and employ two full-time animal control officers, does the 5 Beard have the authority to direct you to do that? 4 A. I wouldn't have done something like that 11 unless they would have given me permission. 25 M. I wouldn't have done something like that 11 unless they would have given me permission. 26 M. I wouldn't have done something like that 11 unless they would have given me permission. 27 M. M. STREIKA: 28 M. STREIKA: 29 Q. All right. 30 Q. I will right. 4 A. I wouldn't have done something like that 11 unless they would have given me permission. 4 M. I wouldn't have done something like that 12 unless that was permission. 5 M. M. STREIKA: 5 M. I guess that I did. I remember talking to 6 him about it, but I dut't remember ever sending an email. 6 McKlarney? 10 Q. All right. 11 M. I wouldn't have done something like that 12 unless they would have given me permission. 12 M. M. STREIKA: 13 Q. All right. 24 Deposition Bohibil Number 15 and entered into the 19 possition Bohibil Number 15 and entered into the 19 possition. 15 M. Break and the first page 20 first two-page document collectively labeled as gradient to be 20 possition. 16 M. I which is the first page 20 first two-page document collectively labeled as public of this two-page document of the 19 public as a public of this two-page document of the 19 public as a public of this two-page document of the 19 public as a public of		, and the second	8	BY MR. STRELKA:
10 2008. 11 Q. Okay. A. The same time that I asked about the 12 it. 13 leftover funding. 14 Q. Wow often does the budget get redone for 15 the sheriff's office? 16 A. Each year. 17 Q. Okay. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 24 control officer. Page 17 2 Q. All right. 3 Q. All right. 4 and employ two full-time animal control officers, does the 2 Board have the authority to direct you to do that? 5 Board have the authority to direct you to do that? 6 A. I guess they could, but I asked them if I out of this two-pege document collectively labeled as Eathibit to the authority to direct you to do that? 5 A. I guess they could, but I asked them if I out of this two-pege document collectively labeled as Eathibit to the authority to direct you to do that? 6 A. I guess they could, but I asked them if I out out out of the control officers. Page 17 5 Q. All right. 5 A. I guess they could, but I asked them if I out of the authority to direct you to do that? 6 A. I guess they could, but I asked them if I out out out of the control officers and the authority to direct you to do that? 6 A. I guess they could have given me permission. 7 Q. All right. 8 asid yes. 9 Q. All right. 9 Q. All right. 10 A. I wouldn't have done searthing like that unless they would have given me permission. 11 I'm not sure. 12 (The above-mentioned document was marked as permission. 13 Please. 14 (The above-mentioned document was marked as permission. 15 (A. No. 16 Deposition Exhibit Number 15 and entered into the poposition.) 16 A. I'm thinking that Charlie Berbert did, but I'm not sure. 17 (A. Ris said just bad runors. 18 'I've received several emils from initials about this emil. 19 G. What did he mean by the? 19 A. Ris said just bad runors. 19 Q. What did he mean by the? 20 Q. Way. I would like you to turn to the second page. Do you see		~		
11 Q. Okay. A. The same time that I asked about the 12 it. 12 lettover funding. 13 lettover funding. 14 Q. Now often does the budget get redone for 14 of that email, that document? 15 the sheriff's office? 16 A. Each year. Q. Okay. And so if this is in 2014, this 17 Q. Okay. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 charge? Q. All right. A. I outdon't have done something like that 11 unless thay would have given me permission. H. Green and expermination of the pagesition. A. I outdon't have done something like that 11 unless thay would have given me permission. H. Tim not sure. 12 Q. Mat did he say? A. He told me one day, he said that I had a meeting with him and he said, I think that you've been fed 15 poison. 18 PK MR. STREKA: 19 Q. Kary. A. I don't remember it, but I and one terved as the point of the touth of the page document that smail, that document? A. I guess that I did. I remember a saw in arked as Exhibit to meeting with him and he said, I think that you've been fed 15 poison. 19 (The above-mentioned document was marked as 15 poison. 10 Q. Kary I would hive but one full-time animal out this essent you ever seen this letter? Q. Now you ever seen this letter? Q. Now you ever seen this lette				
12				·
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14 of that email, that document? 15 the sheriff's office? 16 A. Each year. 17 Q. Okay. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 24 control officer. 25 Page 127 2 A. From 2008 until I guess last year. 26 and employ two full-time animal control officers, does the 27 Beard have the authority to direct you to do that? 28 and employ two full-time animal control officers, does the 29 Beard have the authority to direct you to do that? 20 All right. 21 Could utilize that one person as a field deputy and they 22 said yes. 23 A. I wouldn't have done something like that 10 A. I wouldn't have done something like that 11 unless they would have given me permission. 12 MR. STREIKA: Let's mark this as 15, 13 please. 14 (The above-mentioned document was marked as 15 Deposition Exhibit Number 17 and entered into the 16 A. I wouldn't have done something like that 17 Could utilize that one person as a field deputy and they 18 said yes. 19 Q. All right. 20 A. I wouldn't have done something like that 11 unless they would have given me permission. 12 MR. STREIKA: Let's mark this as 15, 13 please. 14 (The above-mentioned document was marked as 15 Deposition Exhibit Number 17 and entered into the 16 Language of this two-page document collectively labeled as Exhibit 18 WR. STREIKA: Let's mark this as 16 in him about it, but I don't remember ever sending an email. 19 A. I wouldn't have done something like that 10 A. I wouldn't have done something like that 11 I'm not sure. 12 Q. What did he say? 13 A. Be told me one day, he said that I had a merimy with him and he said, I think that you've been fed poison. 14 Page 129 15 A. Pics Giles County Animal Rescue to Morgan Millirons, 15 County Animal Rescue to Morgan Millirons, 16 County Animal Rescue to Morgan Millirons, 17 County Animal Rescue to Morgan Millirons, 18 Page 129 19 A. And h				
15 the sheriff's office? A. Each year. O. Okay. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 10 change? A. I don't know. 2 Q. All right. 3 A. I never did have but one full-time animal 4 control officer. Page 127 A. I gover have a fine animal control officers, does the Board have the authority to direct you to do that? 4 and employ two full-time animal control officers, does the Board have the authority to direct you to do that? 6 A. I guess they could, but I asked them if I could utilize that one person as a field deputy and they 8 said yes. 9 Q. All right. 10 A. I wouldn't have done something like that 11 unless they would have given me permission. 12 Me. STREIKA: Let's mark this as 15, please. 13 Deposition. 14 (The above-mentioned document was marked as Exhibit 15 (The above-mentioned document was marked as Exhibit 16 A. I guess that I did. I remember talking to him about it, but I don't remember ever sending an email. 7 Q. All right, you say here in this email, 8 "I've received several emails from individuals about this is a two-page document toolectively labeled as Exhibit 17 A. I guess that I did. I remember talking to him about it, but I don't remember ever sending an email. 18 "I've received several emails from individuals about this is a two-page document toolectively labeled as Exhibit 19 A. I guess that I did. I remember talking to him about it, but I don't remember ever sending an email. 10 A. I'm thinking that Charlie Herbert did, but 11 I'm not sure. Q. What did he say? 12 A. He said just bad rumors. 13 A. He told me one day, he said that I had a meeting with him and he said, I think that you've been fed poison. 14 A. He said just bad rumors. 15 A. Yes, I wrote this letter? 16 Q. Okay. I would like you to turn to the second page. Do you see that lotton email where it says, 23 "From Glies County Animal Rescue to Morgan Millirons,		•		
16 A. Each year. 17 Q. Okay. And so if this is in 2014, this 18 letter, why — if that is — if that meeting existed and 19 that decision was made in 2008, why did the budget never 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 24 control officer. 25 Page 127 26 A. From 2008 until I guess last year. 27 Q. If the Board has given you money to utilize 28 and employ two full-time animal control officers, does the 29 Board have the authority to direct you to do that? 20 C. All right. 21 A. I guess they could, but I asked them if I or could utilize that one person as a field deputy and they 28 said yes. 29 Q. All right. 20 A. I wouldn't have done something like that 11 unless they would have given me permission. 20 Page 127 21 Could utilize that one person as a field deputy and they 22 Sex Page 20 (The above-mentioned document was marked as Priva to the peposition.) 29 Page 127 20 (The above-mentioned document was marked as Pages 127) 20 All right, we will look at the first page 2 of this two-page document collectively labeled as Exhibit 3 Number 17. 20 Deposition. 21 Deposition Exhibit Number 17 and entered into the 2 Or All right, we will look at the first page 2 of this two-page document collectively labeled as Exhibit 3 Number 17. 21 D. A. I guess they could, but I asked them if I Or A. I guess that I did. I remember talking to 6 him about it, but I don't remember ever sending an enail. 20 All right. 31 Deposition Exhibit Number 17 and entered into the 10 Or All right, we will look at the first page 2 of this two-page document occllectively labeled as Exhibit 3 Number 17. 32 Devote the authority to direct you to do that? 33 A. I guess they could, but I asked them if I Or A. I guess that I did. I remember talking to 6 him about it, but I don't remember ever sending an enail. 22 Or All right. 33 A. I wouldn't have done something like that 11 right page 2 or you recall sheering the main to Mr. 34 I guess that I did. I remember talking to 6 him about it, b				
17 Q. Okay. And so if this is in 2014, this 18 letter, why if that is if that meeting existed and 19 that decision was made in 2008, why did the budget never 19 20 20 21 22 23 A. I don't know. 21 23 24 24 24 25 24 26 27 27 27 27 28 27 28 27 28 27 28 27 28 27 29 29 29 29 29 20 27 29 29 29 29 29 29 29				
18 letter, why if that is if that meeting existed and that decision was made in 2008, why did the budget never 20 change? 20 change? 21 A. I don't know. 22 Q. All right. 23 A. I never did have but one full-time animal 23 control officer. 24 control officer. 25 Page 127 26 Q. All right. 27 Q. All right. 28 A. From 2008 until I guess last year. 39 Q. If the Board has given you money to utilize 4 and employ two full-time animal control officers, does the 5 Board have the authority to direct you to do that? 40 Could utilize that one person as a field deputy and they 2 said yes. 29 Q. All right. 40 A. I guess they could, but I asked them if I 2 could utilize that one person as a field deputy and they 2 said yes. 30 Q. All right. 41 I wholen't have done something like that 3 unless they would have given me permission. 42 MR. STREIKA: Let's mark this as 15, 3 please. 43 Page 129 44 Page 129 55 A. I guess that I did. I remember talking to 6 him about it, but I don't remember ever sending an email. 56 Yes and the said promindividuals about this issue. Do you recall who sent you emails? 57 Q. All right, you say here in this email, 11 I'm not sure. 58 STREIKA: Let's mark this as 15, 12 Q. What did he say? 13 A. He told me one day, he said that I had a meeting with him and he said, I think that you've been fed poison. 14 Page 129 15 Q. What did he mean by that? 16 Q. What did he mean by that? 17 A. He said just bed rumors. 18 Q. Okay. 19 Q. All right, we will look at the first page 2 of this two-page document collectively labeled as Exhibit on the Mr. 19 PY MR. STREIKA: 10 A. I guess they could, but I asked them if I 1 I'm not sure. 11 I'm not sure. 12 Q. What did he mean by that? 13 A. He told me one day, he said that I had a meeting with him and he said, I think that you've been fed poison. 14 Page 129 15 A. He said just bed rumors. 16 Q. Okay. 17 A. He said just bed rumors. 18 Q. Okay. 19 A. And he said, please don't take one person's thoughts from everybody that wants to help. 20 Q. You wrote this		•		
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20 (The above-mentioned document was marked as 21 A. I don't know. 21 Deposition Exhibit Number 17 and entered into the 22 Q. All right. 22 Deposition.) 23 A. I never did have but one full-time animal 23 Page 127 24 control officer. Page 127 2 Q. All right. 2 Q. All right, we will look at the first page 2 of this two-page document collectively labeled as Exhibit Number 17. Do you recall seeing this email to Mr. 4 and employ two full-time animal control officers, does the Board have the authority to direct you to do that? 4 and employ two full-time animal control officers, does the Board have the authority to direct you to do that? 5 A. I guess they could, but I asked them if I could utilize that one person as a field deputy and they said yes. 9 Q. All right. 9 Q. All right, you say here in this email. 6 him about it, but I don't remember ever sending an email. 7 Q. All right, you say here in this email. 8 "I've received several emails from individuals about this issue." Do you recall who sent you emails? 9 Q. All right. 10 A. I'm thinking that Charlie Herbert did, but 11 unless they would have given me permission. 11 I'm not sure. 12 Q. What did he say? 13 A. He told me one day, he said that I had a meeting with him and he said, I think that you've been fed 14 poposition. 16 Q. What did he mean by that? 17 A. He said just bad rumors. 18 Q. Okay. 19 Q. Have you ever seen this letter? 19 A. Page 129 A. Page				manate remot 11.
21 Deposition Exhibit Number 17 and entered into the 22 Q. All right. 22 Q. All right. 23 A. I never did have but one full-time animal 24 control officer. Page 127 1 Q. All right. 3 Q. If the Board has given you money to utilize 4 and employ two full-time animal control officers, does the 5 Board have the authority to direct you to do that? 4 and employ two full-time animal control officers, does the 6 A. I guess they could, but I asked them if I 7 could utilize that one person as a field deputy and they 8 said yes. 9 Q. All right. 9 Q. All right. 10 A. I wouldn't have done something like that 11 unless they would have given me permission. 11 I'm not sure. 12 MR. STREIKA: Let's mark this as 15, 13 please. 13 Deposition Exhibit Number 17 and entered into the 16 poiston.) 14 I'm reverved several emails from individuals about this issue." Do you recall seeing this email to Mr. 4 McKlarney and Mr. Dalton? 5 A. I guess that I did. I remember talking to 6 him about it, but I don't remember ever sending an email. 7 Q. All right, you say here in this email. 8 "I've received several emails from individuals about this issue." Do you recall who sent you emails? 10 A. I'm thinking that Charlie Herbert did, but 1 I'm not sure. 11 I'm not sure. 12 Q. What did he say? 13 A. He told me one day, he said that I had a 14 meeting with him and he said, I think that you've been fed 15 poison. 16 Deposition. Exhibit Number 15 and entered into the 16 Q. What did he mean by that? 17 A. He said just had rumors. 18 Q. Okay. 19 A. And he said, please don't take one person's 16 thoughts from everybody that wants to help. 21 A. Yes, I wrote this letter? 22 Q. Have you ever seen this letter? 23 A. Yes. 24 Deposition.) 25 Deposition.) 26 Deposition Exhibit Number 17 and entered into the 17 poyou recall seeing this email to Mr. 25 Deposition.) 26 Deposition.) 27 Deposition.) 28 T're everved several emails from individuals about this issue." Do you see that bottom email where it says, 2 which is two-page document collectively labeled as Exh				(The above-mentioned document was marked as
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18 Q. Okay. 19 BY MR. STRELKA: 19 A. And he said, please don't take one person's 20 Q. Have you ever seen this letter? 21 A. Yes, I wrote this letter, I think. 22 Q. You wrote this letter? 23 second page. Do you see that bottom email where it says, 24 Prom Giles County Animal Rescue to Morgan Millirons,				-
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20 Q. Have you ever seen this letter? 21 A. Yes, I wrote this letter, I think. 22 Q. You wrote this letter? 23 A. Yes. 24 Thoughts from everybody that wants to help. 25 Q. Okay. I would like you to turn to the 26 Second page. Do you see that bottom email where it says, 27 Thoughts from everybody that wants to help. 28 Second page. Do you see that bottom email where it says, 29 Thoughts from everybody that wants to help. 21 Prom Giles County Animal Rescue to Morgan Millirons,		טע MD פיזיסטיז אי		
21 A. Yes, I wrote this letter, I think. 21 Q. Okay. I would like you to turn to the 22 Q. You wrote this letter? 23 A. Yes. 24 Yes. 25 Second page. Do you see that bottom email where it says, 26 "From Giles County Animal Rescue to Morgan Millirons,"				_
22 Q. You wrote this letter? 22 second page. Do you see that bottom email where it says, 23 A. Yes. 23 "From Giles County Animal Rescue to Morgan Millirons,		-		
23 A. Yes. 23 "From Giles County Animal Rescue to Morgan Millirons,				
21 Q. Onay, I guess chart I don't have any 27 trainary 31, 2013 :				
		y. only, I guess that I don't have any	27	June 1 31, 2013 .

		Morgan Minn		011 04/07/2015 1 ages 15015
1	Α.	Page 13 Hmm-hmm.	0 1	Page 132 the shelter was not accepting any more animals?
2	Q.	Is that a yes?	2	
	_			
3	Α.	Do what?	3	2
4	Q.	Is that a yes? You said hmm-hmm.	4	,
5	Α.	Yes, I see it.	5	was and I don't remember
6	Q.	Okay. And do you recall, she says here, "		~ *' *
7	-	ence as NO volunteers allowed, period." Had	7	· · · · · · · · · · · · · · · · · · ·
8	-	prior inquiries from Ms. Link-Owens?	8	
9	Α.	I'm not sure.	9	
10	Q.	All right.	10	
11	A.	I might have.	11	
12	Q.	Do you know why you didn't contact her, wh		· ·
13	you didn't re	spond?	13	Deposition Exhibit Number 19 and entered into the
14	A.	No, I don't.	14	Deposition.)
15	Q.	Sitting here today, you don't have any ide	15	
16	why you did n	not respond to her?	16	MR. GUYNN: You mean marked as 19?
17	A.	No, I don't.	17	MR. STRELKA: Yes.
18	Q.	Were you concerned about the well-being of	18	
19	the animals i	n the shelter after these volunteers were	19	BY MR. STRELKA:
20	prevented acc	ress?	20	Q. All right. Do you recall receiving the
21	A.	Sure.	21	email from Chris McKlarney that is on the bottom of that
22	Q.	All right.	22	first page there on April 22, 2013?
23	A.	I just wanted to make sure that they were	23	A. Yes.
۱	hoing taken o	are of, adopted. I mean, the euthanization	24	0 304 40 40 40 40 40 40 40 40 40 40 40 40 4
24	being taken t	alo ol adopoda. I modil dio dadidilladidi	24	Q. And is that your response above it on April
24	being taken t			~ 1 1
1		Page 13 pped, and that was the whole idea.		Page 133
		Page 13	1	Page 133 22, 2013 at 4:22 p.m.?
1	rate had drop	Page 13 pped, and that was the whole idea.	1 1	Page 133 22, 2013 at 4:22 p.m.? A. Yes.
1 2	rate had drop Q. A.	Page 13 oped, and that was the whole idea. Hmm-hmm.	1 1 2 3	Page 133 22, 2013 at 4:22 p.m.? A. Yes. Q. All right, and let's look at the second
1 2 3	rate had drop Q. A. of cats and t	Page 13 Apped, and that was the whole idea. Hmm-hmm. We wanted we would start out with a lot	1 1 2 3	Page 133 22, 2013 at 4:22 p.m.? A. Yes. Q. All right, and let's look at the second page there, the very bottom, you see it says April 22 at
1 2 3 4	rate had drop Q. A. of cats and t	Page 13 sped, and that was the whole idea. Hmm-hmm. We wanted we would start out with a lot they would I think that Angels of Assisi or	1 2 3 4	Page 133 22, 2013 at 4:22 p.m.? A. Yes. Q. All right, and let's look at the second page there, the very bottom, you see it says April 22 at 9:27 in the morning. Did you send that email to Chris
1 2 3 4 5	rate had drop Q. A. of cats and t	Page 13 sped, and that was the whole idea. Hmm-hmm. We wanted we would start out with a lot they would I think that Angels of Assisi on that would come and get most of them.	1 1 2 3 4 5	Page 133 22, 2013 at 4:22 p.m.? A. Yes. Q. All right, and let's look at the second page there, the very bottom, you see it says April 22 at 9:27 in the morning. Did you send that email to Chris McKlarney?
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	Morgan Minito	115	JII 04/07/2015 1 ages 154157
1	Page 134 MR. STRELKA: Well, let's just look at this	1	Page 136 Q. All right. Do you see the it is the
2	email. Let's mark that as Exhibit Number 20,	2	fourth paragraph.
3	please.	3	A. Yes.
4		4	Q. "What I understand to be the issue is
5	(The above-mentioned document was marked as	5	someone getting into the locked room to give a puppy that
6	Deposition Exhibit Number 20 and entered into the	6	came in on the weekend food and someone 'allegedly'
7	Deposition.)	7	breaking into the animal control officer's office - locked
8		8	room." Did you ever have a discussion with this woman
9	BY MR. STRELKA:	9	about these issues?
10	Q. Now, I will ask you if you recall receiving	10	A. I don't know if I did or not.
11	this email. Do you recall receiving this?	11	Q. All right.
12	A. No, I don't.	12	A. A lot of times I talk to people on the
13	Q. Do you recall ever issuing a response to	13	telephone and I don't know how to put a face with it.
14	it?	14	Q. Here Ms. Lowry is indicating, and I'm
15	A. I'm not sure.	15	saying it's Ms. Lowry because it says, "From: Ms. Lowry."
16	MR. STRELKA: That will be Exhibit Number	16	A. I understand.
17	21.	17	Q. Here Ms. Lowry is indicating in this email
18		18	that the locked food room was broken into to provide food
19	(The above-mentioned document was marked as	19	for an undernourished dog. Would you agree that that was
20	Deposition Exhibit Number 21 and entered into the	20	an appropriate action by if true, by the volunteers?
21	Deposition.)	21	A. If true, yes.
22		22	Q. Okay. But I guess you don't know we
23	BY MR. STRELKA:	23	don't know if it was true or not?
24	Q. Do you recall receiving this email from	24	A. No, I don't.
	Page 135		Page 137
1	April Lowry on Monday, March 4, 2013? Do you recall	1	Q. And I guess that you never touched base
2	receiving this?	2	with this woman?
3	A. I'm thinking that I did.	3	A. No.
4	Q. Do you recall if you ever issued any	4	Q. All right.
5	response to it?	5	A. Not that I know of.
6	A. No.	6	Q. Upon receipt of this information, did this
7	Q. You don't recall?	7	give you pause about whether or not that food room should
8	A. Well, wait just a minute. Okay. I don't	8	be locked? Did you reconsider that decision?
9	know if I responded back to that or not.	9	A. I did, and I asked them why it was being
10	MR. STRELKA: All right, this two-page	10	locked, and they told me that they leave out there during
11	document will be marked as Exhibit Number 22,	11	the day after feeding the animals, and they would come
12	please.	12	back and they would re-feed them, and you can give them
13		13	too much.
14	(The above-mentioned document was marked as	14	Q. All right.
15	Deposition Exhibit Number 22 and entered into the	15	A. They said that was the issue.
16	Deposition.)	16	Q. Okay. Couldn't that issue have been solved
17		17	by a little piece of paper on a clipboard with a pencil
18	MR. STRELKA: Let's go off the Record for a	18	where you would write down who was fed and when?
19	second.	19	A. I guess it could have.
20	(Discussion off the Record.)	20	Q. So really
21	(A recess was taken.)	21	A. I mean
22	BY MR. STRELKA:	22	Q. Would you agree with me that there were
23	Q. Have you had a chance to read this email?	23	other ways to address that issue other than locking the
1 24	A. I did.	24	food door?
24			

Pages 138..141

	Morgan Millirons on 04/07/2015 Pages 138141						
1	Page 138	1 .	Page 140				
1	A. Well, there are other ways but that is one	1	you are not Verizon, but if there was no cell service and				
2	way to guarantee they are not getting re-fed.	2	the phone was locked up, there is really no way for them				
3	Q. But it's also a way to guarantee that, if a	3	to call, is there?				
4	dog is in need of nourishment and volunteers don't have	4	A. That is probably correct.				
5	the key to get in the locker room, that the only way to	5	Q. Do you see on this first page, do you see				
6	provide that nourishment at the shelter would be to break	6	the bottom line where it says, "The only sure way of				
7	in that locked room; isn't that right?	7	securing the facility and its items will be to have				
8	A. They could do that or they could also call	8	cameras on hand and GCAR is more than willing to				
9	and tell somebody what they have going on.	9	purchase these items;" do you see that?				
10	Q. And was there I think that you addressed	10	A. Hmm-hmm.				
11	this, but I just want to make sure. I know that the	11	Q. You said hmm-hmm.				
12	animal control officer's office was broken into and you	12	A. Yes, I agree.				
13	said the papers were shuffled and in disarray and so	13	Q. Did you ever have any discussion with any				
14	forth?	14	member of Giles County Animal Rescue about the purchasing				
15	A. Yes.	15	of surveillance equipment for the shelter?				
16	Q. Nothing was taken, though, right?	16	A. No, sir.				
17	A. As far as I know, there wasn't, except for	17	Q. Didn't you indicate earlier that you				
18	dog leads and buckets and pans.	18	desired cameras at the shelter?				
19	Q. But that had happened earlier; isn't that	19	A. I did, but				
20	right?	20	Q. Didn't you indicate earlier that the				
21	A. Well, that is when, you know, things had	21	problem with that was the cost? You said that it was				
22	been disappearing.	22	expensive, and they talked about a time clock; isn't that				
23	Q. Right, right, but my point is, it's not	23	right?				
24	like, in order to get access to the dog leads and buckets	24	A. Yes.				
	Page 139		Page 141				
1	and pans, you would have to break into the animal control	1	Q. Okay. And				
2	officer's office; right; they are not just kept there?	2	MR. GUYNN: I think what he said was the				
3	A. As far as I know, there is not anything	3	County discussed that.				
4	that is you know, there wasn't any medication missing.	4	THE WITNESS: The County discussed that. I				
5	Q. Are you aware of just because you've	5	didn't discuss that with GCAR.				
6	physically been to the animal shelter, right?	6	BY MR. STRELKA:				
7	A. Yes, sir.	7	Q. All right, and we know that, and did you				
8	Q. Are you aware of whether or not you had	8	have any discussions with the County about GCAR being				
9	cell service when you were there?	9	willing to purchase cameras?				
10	A. No, I'm not.	10	A. No, not that I know of, and they never				
11	Q. Have you ever heard of about there being	11	mentioned it to me.				
12	any difficulty with having cellular service at the animal	12	MR. STRELKA: All right. This will be				
13	shelter?	13	Exhibit Number 23.				
14	A. Yes.	14					
15	Q. And is there a phone that is at the animal	15	(The above-mentioned document was marked as				
16	shelter?	16	Deposition Exhibit Number 23 and entered into the				
17	A. There is.	17	Deposition.)				
18	Q. All right.	18	Aposteton, /				
19		19	BY MR. STRELKA:				
		20					
20	Q. It's locked up in the office?		Q. Before you, Sheriff, is a multi-page				
21	A. Yes.	21	document which has been collectively marked as Exhibit				
22	Q. Okay. And you mentioned earlier that they	22	Number 23. Do you recall receiving the first email, the				
23	could always call, but assuming I mean, I know that we	23	top email on the first page from Chris McKlarney on May				
24	don't know, I'm not the cellular god and you don't know;	24	13, 2013?				
		1					

		Morgan Milliro	,119 (JII 0 1/0//201	Pages 142145
		Page 142			Page 144
1	Α.	No, not right off.	1		about that. I want you to go ahead and
2	Q.	Okay. And do you recall reading or do you	2		you see at the bottom here, there is an
3		eing presented with this long email by	3		there is a time stamp and date, Christine
4	Christine Lin	x-Owens before?	4		nd I want you to read this email that starts,
5	Α.	No, sir. I've had several emails from her,	5		, In today's local Giles newspaper." Read
6		emember this one in particular.	6		me when you are done.
7	Q.	Okay. And did you ever respond to an email	7	A.	Okay.
8	from Ms. Link		8	Q.	Do you recall receiving this email?
9	Α.	I think that I did.	9	A.	I do.
10	Q.	Okay.	10	Q.	Did you have any discussions with anyone
11	Α.	As many as she sent me, I hope that I did.	11	about this ema	ail that she sent you?
12	Q.	All right, right, and did you ever have a	12	Α.	I'm thinking I did.
13		th Chris McKlarney about her, specifically	13	Q.	Do you recall with whom?
14	her, Christin	e Link-Owens?	14	A.	I'm thinking Marilyn Hollie and Chastity.
15	A.	I don't know.	15	Q.	All right, the email on the first page that
16	Q.	Do you see where and I'm just curious,	16	is that lo	oks to be from you, do you recall seeing that
17	do you see wh	ere on the first page, second email, in other	17	email in respo	onse to Ms. Link-Owens?
18	words, the em	ail that is the middle of the way down from	18	A.	No, I don't.
19	"Giles County	Animal Rescue," there is a line in the	19	Q.	Okay.
20	email address	where it says, "c.c." for carbon copy, where	20	A.	But apparently I did.
21	you have "Sus	an Kidd, April Lowry, Chris Sokol, Jo	21	Q.	You have no reason to doubt that that would
22	Thomason, Cha	rlie Herbert;" do you know any of those	22	be your email	?
23	individuals?		23	A.	No, that is my email address.
24	A.	I know Susan Kidd, Chris Sokol, and Charlie	24	Q.	Do you see where it says, "I will have this
			1		
		Page 143			Page 145
1	Herbert.	Page 143	1	issue correcte	Page 145 ed if it is on my end"?
1 2	Herbert.	Page 143 Were they volunteers, or who were they?	1 .	issue correcte	
		<u> </u>	1		ed if it is on my end"?
2	Q.	Were they volunteers, or who were they?	1 2	A. Q.	ed if it is on my end"? Yes.
2 3	Q. A.	Were they volunteers, or who were they? I think that Charlie was and Chris.	1 2 3	A. Q.	ed if it is on my end"? Yes. What steps did you take after responding to
2 3 4	Q. A. Q.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay.	1 2 3 4	A. Q. this email in A.	ed if it is on my end"? Yes. What steps did you take after responding to the furtherance of correcting this issue?
2 3 4 5	Q. A. Q. A.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary.	1 2 3 4 5	A. Q. this email in A.	ed if it is on my end"? Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see
2 3 4 5 6	Q. A. Q. A. Q.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay.	1 2 3 4 5 6	A. Q. this email in A. any negative p	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end.
2 3 4 5 6 7	Q. A. Q. A. Q. A.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator.	1 2 3 4 5 6 7	A. Q. this email in A. any negative p	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the
2 3 4 5 6 7 8	Q. A. Q. A. Q. A.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of	1 2 3 4 5 6 7 8	A. Q. this email in A. any negative p Q. image of the s	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office?
2 3 4 5 6 7 8	Q. A. Q. A. Q. A. Q. a publication	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of	1 2 3 4 5 6 7 8	A. Q. this email in A. any negative p Q. image of the s	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office?
2 3 4 5 6 7 8 9	Q. A. Q. A. Q. A. Q. a publication 2013 about the	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter?	1 2 3 4 5 6 7 8 9	A. Q. this email in A. any negative p Q. image of the s A. the County.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and
2 3 4 5 6 7 8 9 10	Q. A. Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No.	1 2 3 4 5 6 7 8 9 10	A. Q. this email in A. any negative p Q. image of the s A. the County. Q.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right.
2 3 4 5 6 7 8 9 10 11 12	Q. A. Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are	1 2 3 4 5 6 7 8 9 10 11 12	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this?
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are	1 2 3 4 5 6 7 8 9 10 11 12 13	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this?
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24.	1 2 3 4 5 6 7 8 9 10 11 12 13 14	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos:	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as attion Exhibit Number 24 and entered into the	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos:	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as ition Exhibit Number 24 and entered into the ition.)	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos:	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be h	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as ition Exhibit Number 24 and entered into the ition.)	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos:	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he Depos. Depos. Depos. Depos.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as ition Exhibit Number 24 and entered into the ition.)	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depose	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he Depos. Depos. Depos. Depos.	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as ition Exhibit Number 24 and entered into the ition.) A: This is a two-page document, and do you see	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depose	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.) A: Do you recall seeing this email to Chris
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be he Depos Depos. BY MR. STREIK. Q. the top part,	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as ition Exhibit Number 24 and entered into the ition.) A: This is a two-page document, and do you see	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos: Depos: Depos: McKarney about	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.) A: Do you recall seeing this email to Chris t Chastity Perkins?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A. Q. A. Q. a publication 2013 about the A. Q. going to be have Depose Depose Depose The comparation of the part, "Christine"?	Were they volunteers, or who were they? I think that Charlie was and Chris. Okay. But Susan, she was the secretary. Okay. To the County administrator. I got you, I got you, okay. Do you recall in the Giles County newspaper in July of e shelter? No. Okay, let's just look at this. You are anded this will be Exhibit Number 24. (The above-mentioned document was marked as action Exhibit Number 24 and entered into the ition.) A: This is a two-page document, and do you see the two paragraphs and then it says	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. this email in A. any negative p Q. image of the s A. the County. Q. A. Q. Depos: Depos: Depos: Depos: Depos: A. Q. McKarney about A. Q.	Yes. What steps did you take after responding to the furtherance of correcting this issue? Well, I told them that I didn't want to see publicity about anybody on our end. All right, were you concerned about the sheriff's office? Well, the image of the sheriff's office and All right. Are we done with this? Yes, sir. This will be Exhibit Number 25. (The above-mentioned document was marked as ition Exhibit Number 25 and entered into the ition.) A: Do you recall seeing this email to Chris t Chastity Perkins? Yes.

1	Page 146	1	Page 148 Q. All right.
2	MR. STRELKA: Exhibit Number 26, please.	2	A. And it refers back to your CAD call, the
3		3	Computer Aided Dispatch.
4	(The above-mentioned document was marked as	4	Q. And what is the IBR report used for?
5	Deposition Exhibit Number 26 and entered into the	5	A. That is used for well, for court, for
6	Deposition.)	6	records, and it is also used for the victim and the my
7	2000202011/	7	mind just went blank. I do this all of the time, the UCR,
8	BY MR. STRELKA:	8	Universal Crime Report.
9	Q. All right, the email on the bottom from	9	Q. Okay, so the information provided in an IBR
10	Chris McKarney to Morgan Millirons, November 7, 2013?	10	report is relied upon by other law enforcement officials;
11	A. Yes.	11	would that be a fair statement?
12	Q. Do you recall receiving that?	12	A. It could be.
13	A. No, but I'm sure I probably did.	13	Q. Is an IBR report ever used in the course of
14	Q. Where it says, "Scott filed a FOIA	14	prosecution of a crime?
15	request," are you aware of whether or not Brian Scott	15	A. It is, yes. It is one of the best things
16	Dunn filed a FOIA request?	16	they ever came up with.
17	A. He probably did.	17	Q. And did you ever alter or change an IBR
18	Q. So is it your understanding that when	18	report in the course of your duties as sheriff, and when I
19	McKlarney here is saying "Scott filed a FOIA request,"	19	say alter or change an IBR report, I mean one that had
20	he's referring to Brian Scott Dunn?	20	already been created and then you accessed at a later date
21	A. Hmm-hmm, yes, sir.	21	and made changes.
22	Q. Okay. And then did you respond with that	22	A. Me?
23	email on top, Thursday, November 7th?	23	Q. Yes.
24	A. Yes.	24	A. I've edited IBR reports.
1	Page 147 Q. Okay. And is that statement, "I checked	1	Q. Okay. Do you recall an IBR report in
2	with Kelly McCroskey and she stated that we do not have	2	which well, as part of this case, that is, Mr. Dunn had
3	any time sheets for her here" a truthful statement?	3	done an investigation and provided a report that you later
4	A. Yes, that's right.	4	went back and changed?
5	Q. So the sheriff's department never the	5	A. Which one are you talking about?
6	sheriff's office never maintained any time records for Ms.	6	Q. We'll look at it. I will get to that in
7	Perkins?	7	just a few minutes. I'm going to jump around. I wish
8	A. No. Are we going to break for lunch?	8	that I had all of that stuff lined up here, but I don't
9	(Discussion off the Record.)	9	know. I will just go in my order here. All right. Let's
10	(21204821011 011 410 1000141)	10	mark this as Exhibit Number 27. It is a collection of
11	(A lunch recess was taken.)	11	documents that has been sequentially Bates labeled
12	,	12	Defendant's Response to Plaintiff's Request for Production
13	BY MR. STRELKA:	13	of Documents 2 all the way through 16. This will be our
14	Q. On the Record, all right, what is an IBR	14	Exhibit Number 27.
15	report, Sheriff?	15	
16	A. It is an Incident Based Reporting report.	16	(The above-mentioned document was marked as
17	Q. All right, and is it an electronic record?	17	Deposition Exhibit Number 27 and entered into the
18	A. It could be.	18	Deposition.)
19	Q. How would someone at the sheriff's office	19	*
20	report an IBR report?	20	BY MR. STRELKA:
21	A. An officer would have to get an incident	21	Q. Now, we will go through this one by one, so
22	number, what we call a VFS, and this year it would be	22	I just want to you to look at the first page now.
23	201500 dash whatever the next incident number would be.	23	A. Okay.
24	It's generated by the dispatcher.	24	Q. I believe that these were documents that
	± 10 m± mm m m m m m m m m m m m m m m m m	1 -	~

Pages 150..153

	Willigan Wil	0	1 ages 150155
1	Page were contained within Mr. Dunn's personnel file, if I	e 150 have 1	Page 152 Q. Okay. Did you send this to anyone or did
2	that right.	2	this just go in his personnel file?
3	A. Okay.	3	A. It just went to his personnel file.
4	Q. That is what we should be looking at.		Q. That is what I was trying to get at, what
5	I'm wrong, let me know. This first letter, do you	5	was the purpose of this? When you say, "This was because
6	recognize this?	6	of a write-up that occurred on September 12, 2013," and I
7	A. Yes.	7	guess that I go to the next page. Let's look at the next
8	Q. And is that your signature at the bottom		page.
9	A. It is.	9	A. Okay.
10	Q. And this is a letter that you wrote	10	Q. Is this the write-up that you were
11	terminating Scott Dunn?	11	referring to?
12	A. Yes, sir.	12	A. Yes.
13	Q. Okay. Let's move on. If you could tak		Q. And is that your signature?
14	moment and read the letter that I'm going to refer		A. Yes, it is.
15	these pages as Bates labeled; do you see the bottom ri-		Q. Okay. And
16	A. Yes, sir.	16	A. Are we finished with this one?
17	,	17	
	Q. It says 0003? A. Yes, sir.		Q. Yes, sir, we're just flipping through.
18	•	18	We're on Page 4 now. All right. You say here, "This was unbecoming conduct of a Deputy Sheriff, General Order 23,
19	Q. And so you will refer to those for the	_ 19	
20	Record as you know, please look at the page that ha		Section C, by making an entry into the CAD system of this
21	been Bates labeled Number 3 and then you look at this,	so 21 22	sort." If I was a deputy sheriff, where would I find
22	we're looking at Number 3 right now. Do you recall		General Order 23; where is that located?
23	writing this?	23	A. That was under that was it's conduct.
24	A. I do.	24	Q. Okay. It's like code of conduct?
		151	Page 153
1	Q. And is that your signature?		A. Yes.
2	A. It is.	2	Q. And can you
3	Q. All right.	3	MR. GUYNN: Wait a minute, where is it
3 4	Q. All right. A. But I thought that I sent one back that	3 4	MR. GUYNN: Wait a minute, where is it stored, I think is what he's asking.
3 4 5	Q. All right. A. But I thought that I sent one back that didn't have the	3 4 5	MR. GUYNN: Wait a minute, where is it stored, I think is what he's asking. BY MR. STRELKA:
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	Morgan Milliro	on 04/07/2015 Pages 15415/	
1	Page 154	1	Page 156
1 2	there a derogatory remark about the investigators being at a fantasy football meeting. You know, that was more	1 2	person that was intoxicated and being videoed. Q. Okay. So are you saying that you wrote up
3	important than them coming to work.	3	somebody, an employee?
4	Q. Right, and Mr. Dunn didn't use the words	4	A. Yes.
5	"more important," though, did he?	5	Q. Who had been videoed being intoxicated and
6	A. No, he didn't.	6	it was posted on line, and you felt that that was conduct
7	Q. Okay, and he and you say derogatory, but	7	not appropriate and unprofessional; is that what you are
8	he didn't use any adjectives or adverbs; he didn't	8	saying?
9	wouldn't it be fair to say, a fair statement, that he just	9	A. Yes, sir.
10	wrote that facts in there? I mean, how is that fact	10	Q. So that person was written up for a
11	derogatory?	11	violation of General Order 23, Section C; is that right?
12	A. Well, it didn't need to be in there, and it	12	A. Yes.
13	was very unprofessional.	13	Q. And that person, is there a record of that
14	Q. And isn't it the job of a police officer or	14	in their personnel file?
15	a law enforcement official to record all of the facts as	15	A. There is.
16	they occur during the investigation into the CAD?	16	Q. And who is that person?
17	A. That didn't have anything to do with the	17	A. I don't discuss personnel issues.
18	investigation.	18	Q. Well, you are under Oath by subpoena to
19	Q. Wasn't he attempting to try to procure the	19	talk to me, regard let of whether it is personnel or not.
20	services of these other law enforcement officials to	20	A. Can I do that?
21	assist with the collection of evidence?	21	MR. GUYNN: Have we entered into the
22	MR. GUYNN: I will object to what he was	22	Protective Order yet?
23	doing. Go ahead.	23	MR. STRELKA: Not yet. Can we go off the
24	THE WITNESS: He was already there. The	24	Record?
	Page 155		Page 157
1	Page 155 investigator had already been there and collected	1	Page 157 (Discussion off the Record.)
1 2		1 2	
	investigator had already been there and collected		(Discussion off the Record.)
2	investigator had already been there and collected the evidence and did the photographs.	2	(Discussion off the Record.) BY MR. STRELKA:
2 3	investigator had already been there and collected the evidence and did the photographs. BY MR. STRELKA:	2 3	(Discussion off the Record.) BY MR. STRELKA: Q. Back on the Record, all right, you gave
2 3 4	investigator had already been there and collected the evidence and did the photographs. BY MR. STRELKA: Q. Right, and do you recall Mr. Dunn's	2 3 4	(Discussion off the Record.) BY MR. STRELKA: Q. Back on the Record, all right, you gave that example of when an employee was deemed to have
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		Page 158			Page 160
1		was, or was going or something.	1		Dunn is indicating that there was
2	Q.	Okay.	2		ce that was not collected, so wasn't
3	Α.	Or was already there.	3		ggess be violating his duties by not
4	Q.	And so you don't take any issue with this	4	going back out the	
5	statement bei	ng a lie, do you, the fantasy football	5	A. If	there was something there, yes.
6	meeting? The	fact that Mr. Dunn wrote it, you think that	6	Q. Was	s Mason Boggess ever written up?
7	it's unprofes	sional, from my perspective; that is what you	7	A. No	
8	testified, ri	ght?	8	Q. Dio	d it make you mad when he put that in
9	A.	Yes, it is.	9	there?	
10	Q.	But do you think the statement is	10	A. It	did; it disappointed me.
11	untruthful?		11	Q. Why	y is that?
12	A.	I don't know. I don't know if it is or	12	A. To	see somebody put something on a computer
13	not.		13	system that you th	nink cannot be taken off.
14	Q.	Okay. But you testified that you did talk	14	Q. Oka	ay.
15	to Mason Bogg	ess and am I saying that right?	15	A. I'	ve been involved in cases before where
16	A.	"Boggess."	16	you don't know who	ere these things are going to end up.
17	Q.	Okay, and he did indicate that he was going	17	You don't know if	they are going to be at the prosecutor's
18	to a meeting	or had gone to a meeting or something along	18	office or the defe	ense attorney's office or the Court of
19	those lines?		19	Appeals for the st	tate Supreme Court or wherever.
20	Α.	He did.	20	Q. Oka	ay. So is it your practice and procedure
21	Q.	Okay, so	21	to go back and ame	end and edit records so that your cases
22	A.	But he didn't tell me where he was exactly,	22	aren't appealed?	
23	but he said t	hat he did have some plans and he couldn't	23	A. No	
24	get there rig	ht then.	24	Q. But	t you did that here?
		2 40			
1	0.	Page 159 Right, the comment written by Mr. Dunn	1	A. I o	Page 161 did it on one, yes. I did; I took that
2	~	actly where he was either, though, did it?	2	off.	
3	Α.	No.	3		l right.
4	0.	Does Mason Boggess have any sort of special	4	-	cause it was unprofessional.
5	~	Giles County sheriff's office in relation to	5		you know a Deputy Hahnlen?
6		n of evidence at a crime scene?	6	A. Yes	
7	A.	He does.	7		you know if she was present at that
8		And what are those duties?	8	crime scene on the	
9	Α.	He is our forensics evidence tech.	9	A. I o	
10	Q.	Do you have another forensics evidence	10		d do you know if she had indicated to
11	tech?	20 You make another foreigness extraction	11		ason Boggess had missed evidence?
12	A.	No, not now.	12	A. No.	
13	Q.	At the time that this occurred, would you	13		you ever recall any discussion with
14	_	ason Boggess considered to be on call when	14	Q. DO Deputy Hahnlen abo	-
15		ason boggess constuered to be on carr when	15		
	needed?	Thou are all on sell was			, sir.
16	Α.	They are all on call, yes.	16		l right.
17	Q.	Okay. And so if an officer is requesting	17		had some others that talked to her.
18		specialist deputy to appear on a scene, it's	18	_	t's go to the next page, 5.
19	-	son Boggess to get out to the scene, isn't	19	A. Oka	-
20	it?		20		d you write this?
21	Α.	Yes, but he was already there.	21		t me see. I did.
22	Q.	He had been there earlier?	22		d you wrote this, it said on September
23	Α.	Yes, he was there earlier.	23		on this is October 1, so you wrote this
24	Q.	Right, and but under these	24	in response to the	e phone call that you got from Major
L			I		

1 Falls; is that correct? 2 A. Yes, that's right. 3 Q. Why was why was this document written? 4 This is you wanted to place this in Dumn's personnel 5 file; is that right? 5 Q. And who did you discuss it with? 6 A. Yes. 7 Q. Okay, for what purpose? 8 A. Well, Number One, he goes to my chief 9 deputy's house after he's demoted, and he told me, he said 10 that Scott Dunn just left his house in Eggleston after 11 being ordered off his property. I asked him why, and he 12 said Scott had been to his home and he told him that he 13 wanted to talk to him, and when Scott got out of his 14 vehicle, the first thing that came out of his mouth is 15 "Things are going to get bad between me and Morgan." 16 Mike said he looked at him and asked him what he was 17 talking about, and he said the Board of Supervisors are 18 pissed, they had a special meeting, and the Board is going 19 to ask the Attorney General to investigate the Giles 20 County sheriff's office. 21 Q. Do you mind if I stop you right there? Did 22 you ever have any conversation with Scott Dunn about that 23 information, about the Board asking the Attorney General's 24 office to investigate the sheriff's office? 21 A. No. 22 Q. Have you discussed that with any member of 24 A. I have. 3 the Board since? 4 A. I have. 5 Q. And who did you discuss it with? 6 A. I discussed with Barbara Hobbs. 7 Q. And what did she say? 8 A. And Chris McKlarney. 9 Q. And what did he say? 10 A. They didn't know anything about that at the time. 11 time. 12 Q. Okay. Are you aware are you aware of any topics that were discussed that are not included in this letter between Mr. Falls and Mr. Dum? 15 A. No. 16 Q. Are you aware of whether or not these gentlemen shouted at each other or whether anyone shouted at each other? 18 A. Oh, I'm sure they did. 19 Q. So did you consider this entire scene with Scott Dum and Mike Falls to be a deviation of policy on behalf of Scott Dum, and by "policy," I mean shares policy? 19 A. Yes.		Morgan Minito	115	on 04/07/2015 1 ages 102105
A. Yes, that's right. O. May was — why was this document written? filer is that right? A. Yes. A. Yes. Case, for what purpose? A. Well. Number Coop, be goes to my chief deputy a house after be a denoted, and be told me, he said that Scott harm just left, his house in Bylactan after be added to talk to him, and when Scott pot out of his wanted to talk to him, and and he told him hat he was talk he Ranted him white he was talk he Ranted him hat he was talk he	1	· ·	1	Page 164
0. May was — withy was this document written? 4 This is — you surned to place this in Durn's personnel 5 filer is that right? 6 A. Yes. 7 O. Key, for what purpose? 8 A. Well. Number One, he goes to my chief 9 deputy's human after he's damoted, and he told ma, he said 10 that Scott Durn just left his house in Bayleston after 11 being ordered off his property. I asked him kfy, and he said 12 said Scott had been to his brow and he told him that he 12 sames to talk to him, and when Scott got bur of his such in Sayleston after 13 sames to talk to him, and when Scott got bur of his such in 13 while, the first thing that cam out of his moth is 14 whiche, the first thing that cam out of his moth is 15 "Things are going to get had between me and Morgan." 15 things are going to get had between me and Morgan. 15 things are soing to get had between me and Morgan. 15 things are soing to get had between me and Morgan. 15 things are soing to get had between me and Morgan. 16 O. Are you savere of whether anyone shouted at each other or whether anyone shouted 20 you ever hear an early strained the secret of the special meeting, and the Board asking the Attorney General's 21 office to investigate the sheriff's offices? 1 A. No. 1 Page 163 1 A. No. Page 163 1 A. No. Page 164 A. No. Did you ever have any discussion with any 3 Board ember shout that topher than 4 A. No. 2 D. Did you ever have any discussion with any 4 A. No. 1 A. No. Page 165 2 A. Wo. Page 165 1 A. No. Page 165 2 A. Wo. Page 165 2 A. Wo.				
## This is — you wanted to place this in Dum's personnel ## This is — you wanted to place this in Dum's personnel ## A. Yes. ## Q. Okay, for what purpose? ## A. Well, Number One, be upset to my chief ## A. Well, Number One, be upset to my chief ## A. Well, Number One, be upset to my chief ## A. Well, Number One, be upset to my chief ## A. Well Submoss after be is denoted, and be told me, he said ## that Scott Dum just left his house in Righeston after ## Letting ordered of his progency. I asked his why, and he is ## said Scott had been to his home and he told him that he ## said Scott had been to his home and he told him that he ## vehicle, the first thing that came and Norgan." ## This west in the said the Board of Supervisors are ## placed, they had a special meeting, and the Board is spering ## to ask the Attorney General to investigate the Giles ## Country sheriff's office. ## A. Bo. ## Do you wish if I stop you right there? Pid id ## A. Bo. ## Do you were have any conversation with Scott Dum about that that information, about the Board asking the Attorney General's ## office to investigate the sheriff's office? ## A. Bo. ## D. Did you ever have any discussion with any ## Board member about that topic? ## A. I asked Burbara Biothe, I've asked dout it. ## O. Did you ever have any discussion with any ## Board member about that did they say? ## A. I've asked about it. ## O. Did you ever have any discussion with any ## Board member about that did they say? ## A. I've asked about it. ## O. D. Mid what did they say? ## A. I've asked about it. ## O. O. Dear, who did you ask? ## A. No. ## Page 165 ## A. No. ## O. O. Olday, and then the next purposaph, it goes ## Into, it says, "Scott Dum stated the Sheriff's office was say supervisor? if things were done, you said that they are shell and the sheriff's office was say supervisor? if things were done, you said that they are shell and they are ship you are half the sheriff, and some half is the therea? But you are half the string one thing, a complaint to a supervisor?		· · · · · · · · · · · · · · · · · · ·		
5 file/ is that right? 6 A. Yes. 7 Q. Glay, for what purpose? 8 A. Well, Number One, he goes to my chief 9 deputy's house after he's denoted, and he told me, he said 10 that scort Durn just left his bouse in Suglection after 11 being ordered off his property. I asked him why, and he 12 said Scott had been to his house after he's denoted, and he told in that the 13 semest to talk to him, and shes Scott got not of his 14 vehicle, the first thing that came out of his mouth is 15 "Things are going to get had between me and Morgan." 16 Nike said he looked at him and asked him what he was 17 talking about, and he said the Board of Sepervisore are 18 pissed, they had a special meeting, and the Exard is oping 19 to sak the attorney General to investigate the Giles 20 Dounty sheriff's office. 21 Q. Do you mind if I stopy our right there? Did 22 you were have any conversation with Scott Durn about that 23 information, about the Board asking the Attorney Generals 24 office to investigate the sheriff's office? 25 D. Did you were have any discussion with any 26 A. No. 27 Q. Did you were have any discussion with any 27 A. Twe saked about it. 28 O. Okay, who did you ask? 29 A. I saked Between about that other than 29 A. Twe saked about it. 30 Q. Rad what did they say? 31 O. Okay, and then the next paragraph, it opes 31 Q. And did they — did they ever indicate 32 Into a sake the Board of Chap, "I've asked the Board of Supervisors are 33 A. Yes. 34 Okay, Rad what did they say? 35 Okay, and then the next paragraph, it opes 36 Q. Okay, and then the next paragraph, it opes 37 Q. Okay, and then the next paragraph, it opes 38 Okay, and then the sake the Board of Chap; "I in that shout how things were done, you said that they 39 A. The is not a complaint; that is a threat. 30 Q. Okay, and then the next paragraph, it opes 30 Q. Okay, and then the next paragraph, it opes 31 Q. And did they — did they ever indicate 32 A. No. 33 Deficie and out, salaries. Did you were have a discussion 34 A. Yes. 35 Q. Okay, and then the next paragraph,			-	
6 A. Yes. Q. Gosy, for what purpose? A. Well, Number One, he goes to my chief deputy's house after he's demoted, and he told me, he said the theory ended of finis proceety. I saked fall mety, and he led said Scott had been to his home and he told him that he said Scott had been to his home and he told him that he led said Scott had been to his home and he told him that he led said Scott had been to his home and he told him that he led said Scott had been to his home and he told him that he led said Scott had been to his home and he told him that he led whichel, the first thing that came out of his mouth is for "Things are going to get bad between me and Morgan." If white said he looked at him and asked him what he was pissed, they had a special meeting, and the Scard is going to cake the Attorney General to investigate the Siles County sheriff's office. Q. Do you mind if I stop you right there? Did Q. Do you mind if I stop you right there? Did office to investigate the sheriff's office? Page 163 A. No. Page 163 A. No. Page 164 A. No. Q. Did you ever have any conversation with Scott Darm about that this incident? A. No. Q. Did you ever have any discussion with any Shard member about that topic? A. No. Q. Did you ever have any discussion with any Shard member about that topic? A. No. Q. Did you ever have any discussion with any Shard member about that topic? A. No. Q. Did you ever have any discussion with any Shard member about that topic? A. No. Q. Did you ever have any conversation with softice in the capacity of a deputy element of this incident? A. No. Q. Did you ever have any conversation with other than this incident? A. No. Q. Did you ever have any conversation with other than the shard member about that topic? A. No. Q. Did you ever have any conversation with other than the shard member about that topic? A. No. Q. Did you ever have any conversation with soft provided the shard member about that other than this incident? A. No. Q. No day, who did you ask? A. No. Q. And what di				
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20 County sheriff's office. Q. Do you mind if I stop you right there? Did 22 you ever have any conversation with Scott Dumn about that 23 information, about the Board asking the Attorney General's 24 office to investigate the sheriff's office? Page 163 A. No. Page 163 A. No. Page 164 A. No. Did you ever have any discussion with any 3 Board member about that topic? A. No. Did you ever hear about that topic? A. I've asked about it. Q. Did you ever hear about that other than 6 this incident? A. I've asked about it. Q. And what did they say? A. I asked Barbara Hobbs, I've asked Chris 9 A. I asked Barbara Hobbs, I've asked Chris 10 Q. And what did they say? A. No. Q. And what did they say? A. No. Q. And earlier we talked about if somebody had 11 a compaliant about how things were done, you said that they could go to their supervisor; is that right? A. No. Q. And how is this not in line with what you 15 just said earlier today? How is Scott Dumn not just 16 pring gomething, a complaint to a supervisor? A. That is not a complaint; that is a threat. Q. Where is the threat? A. No. South Dumn and Mike Falls to be a deviation of policy on 2 behalf of Scott Dumn, and by "policy," I mean shares pehalicy? A. Yes. Page 163 Q. How so; what did he do wrong here? A. Well, he goes to a supervisor's house, my second in command, and he threatens we, threatens the sheriff's office in the capacity of a deguty sheriff, and also spouting off things that the Board of Supervisors are doing. Q. Okay, so Mike Falls would have been obviously Mr. Dum's supervisor; is that right? Q. And earlier we talked about if somebody had 11 a complaint about how things were done, you said that they could go to their supervisor; is that right? A. Yes. 15 A. No. 16 Q. Okay, and then the next paragraph, it goes into, it says, "Scott Dumn stated the sheriff's office was guilty of a number of things," all right, and let's move beyond that. He said he also says the Board of Okyay ever have a discussion with any 12 in the what				
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beyond that. He said he also says the Board of Supervisors were going to cut positions at the sheriff's office and cut salaries. Did you ever have a discussion with Scott Dunn about that specific issues? A. No. Morgan; is that what you are talking about as a threat? A. No. Morgan; beyond that. He said he also says the Board of A. No. Morgan; is that what you are talking about as a threat? A. No. The Board of Supervisors, and they had a special meeting yesterday on the 28th, the Board is going				-
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22 with Scott Dunn about that specific issues? 22 A. The Board of Supervisors, and they had a 23 A. No. 23 special meeting yesterday on the 28th, the Board is going				
23 A. No. 23 special meeting yesterday on the 28th, the Board is going				-
				-
		<u> </u>		

Pages 166..169

	Morgan Milliro	115 (on 04/07/2015 Pages 100109
1	Page 166 County sheriff's office, and Dunn is stating the sheriff's	1	Page 168 Q. Okay.
2	office is misappropriating of funds and embezzlement and	2	Q. Okay. A. That is in uniform.
3	other things. He also said that the Board is going to cut	3	Q. Okay. And at this time, August 27th, Mr.
4	positions at the office and cut salaries.	4	Dunn was a lieutenant at that time; is that right?
5	Q. Okay, but when you are saying that the	5	A. Yes.
6	threatening language is, what, like "The Board of	6	Q. And so he would have the authority to
7	Supervisors is going to cut positions at the sheriff's	7	direct others such as a deputy to perform work; isn't that
8		8	right?
9	office"? Just tell me what the threat is, specifically, if you could.	9	
	•		
10	'	10	•
11	uniform working and saying, things are going to get bad	11	this decision for that that this call be given to a
12	between me and Morgan. That sets the tone for it right	12	deputy?
13	there. Then once he said things are going to get bad and	13	A. When the others are busy, you don't say, I
14	the Board of Supervisors are, as he said, pissed, and the	14	don't work the road.
15	Attorney General is going to be brought in to investigate	15 16	Q. Would you agree with me that this letter
16	the sheriff's office, and the sheriff's office has been		has absolutely no information about the others being busy?
17	guilty of misappropriation of funds, embezzlement, and	17	A. It probably doesn't.
18	other things, and they are going to cut positions.	18	Q. When did you write this?
19	Q. Let's go to the next page. All right, did you write this, Number 6, dated September 27, 2013?	19	A. August 27th.
20	A. I did.	20	Q. And did you write this other letter,
22		21 22	previous Bates labeled 7, labeled 6, on September 27th? The date that I mentioned was September 27, 2013. Is that
23	Q. All right, and this is just memorializing your decision to demote Scott Dunn?	23	when you said that you wrote this?
24	A. It is.	24	
24	A. 10 15.	24	A. This one here, yes.
1	Page 167	1	Page 169
1 2	Q. Okay. Let's move on. August 27, 2013, did you write he this letter?	1 2	Q. Okay. Okay. Let's look at the next one, Number 8. It's got a date of September 12, 2013.
3	A. I did.	3	A. They are not in order?
4	Q. And I will refer for the Record's purpose	4	Q. No, sir, I am sorry about that. I'm going
5	that this is Bates labeled 7. I believe you testified	5	by the order in which they were produced to me, the 1, 2,
6	earlier about this situation, didn't you?	6	3, 4, 5, 6, 7, 8, sort of thing.
7	A. I don't know.	7	A. Okay.
8	Q. I think that you said about how he said	8	Q. Is that your signature?
9	that he didn't want to go out there on the road?	9	A. It is.
10	A. Yes.	10	Q. Do you recall writing this letter?
11	Q. And I think you said something along the	11	A. I did.
12	lines of it's everybody's every deputy's duty to do the	12	Q. And
13	work, and I'm paraphrasing.	13	A. We just went over that.
14	A. That's right.	14	Q. Yes, this looks like a duplicate.
15	Q. Why is there such a thing called a road	15	A. That is the let's see here. That is a
16	deputy at the sheriff's office?	16	duplicate.
17	A. There is.	17	Q. Yes, it is, okay. All right, then we will
18	Q. What is a road deputy; how is that deputy	18	just pass through Number 8 and move on to Number 9.
19	different?	19	A. Okay, wait a minute here.
20	A. You have a road deputy and you have an	20	Q. And I will let you know, the document
21	investigator and you have court security.	21	the letter for Number 9 goes on to Number 10, so Page 9
22	Q. And what is	22	and ten.
23	A. A road deputy is somebody that wears a	23	A. Okay.
24	uniform and works the road every day.	24	Q. Is that your signature on Page 10?
L			z. 25 Cano four Signature on rage iv.

Pages 170..173

		Morgan Milliro	115 (on 04/07/2015 Pages 170173
1	λ	Page 170 Yes, it is.	1	Page 172 don't know why you don't get the warrant.
2	A. Q.	All right. And the date of this document	2	Q. Well, I'm sure that you had a discussion
3		, 2013. Do you recall writing this?	3	with Scott Dunn about this issue, or maybe you didn't?
4	A.	Yes.	4	A. I don't know.
5	Q.	Did you write it on that date?	5	Q. Do you, sitting here now, do you recall any
6	Α.	Yes, yes, probably, I guess, because it	6	of Scott Dunn's, you know, rebuttal to this, his two cents
7	is yes.	105/ 105/ F105001/ 1 30055/ D000050 10	7	on this whole situation?
8	0.	And after you review the letter, I	8	A. No.
9	~	you to tell me what it is that Dunn did	9	Q. Was there any were there any
10	wrong.		10	difficulties in, other than this issue with the warrant,
11	Α.	This is a case where he was dispatched with	11	prosecuting this Bailey mentioned here?
12		Lebanon Road in Pembroke. He he got a	12	A. No, I think that this was the one that
13		a stepson of John Collins and Scott got the	13	Chad I'm not don't quote me on this, but I think
14		ut this gun, and Bailey was a convicted	14	that this is the one that Chad Tickle ended up finishing,
15		was told to get a warrant, and	15	taking before a grand jury and getting a conviction on.
16	Q.	Scott Dunn was told to get a warrant?	16	Q. That is because Mr. Dunn was no longer
17	Α.	Scott Dunn was told to get a warrant and he	17	working there?
18	never did.	-	18	A. Yes.
19	Q.	Do you know why?	19	Q. So
20	A.	No.	20	A. I'm thinking now this is the one. I'm
21	Q.	All right.	21	really not sure.
22	A.	He was he was told to get a warrant by	22	Q. Okay. We'll go back to that in a little
23	Eric Thwaites	because he was the one I mean, he did all	23	bit. Let's go to Number 11. This is dated July 27th,
24	the hard part	here on this case.	24	2013. I'd like you to take a moment to read this and let
		Page 171		Page 173
1	Q.	Hmm-hmm.	1	me know if that is your signature.
2	A.	He just didn't get any charges on it. He	2	A. It is.
3	said, it's not	my job.	3	Q. So do you recall writing this?
4	Q.	And are you aware of whether or not Mr.	4	A. I do.
5	Dunn ever requ	ested any other law enforcement official to	5	Q. So what happened here?
6	go and collect	some of the evidence that had been, you	6	A. I come into work the next morning, after
7	know, scattere	d here? You know, he was talking about	7	I think that it was on the 27th of July, there was an
8	evidence being	in pawn shops, this property. Did you ever	8	email sent to me from Jackie Martin.
9	have were y	ou aware that Scott Dunn had ever requested	9	Q. Who is Jackie Martin?
10	that?		10	A. He is the chief of police in Pearisburg.
11	Α.	I don't know, but I think that there was a	11	Q. Okay.
12		ere some of the pawn shops got some of the	12	A. He said that well, you should have a
13	stuff in West	Virginia.	13	copy of that.
14	Q.	Okay.	14	Q. I can read this letter, but
15	Α.	I believe. I'm not sure.	15	A. That stated that Scott had caused some
16	Q.	All right, and is it is it proper	16	controversy with the Pearisburg Police Department.
17	_	btain a warrant prior to the collection of	17	Q. This was about capability of the radios?
18	_	perty if you know where it is?	18	A. Yes.
19	Α.	If you know where if you don't know	19	Q. Whether all of the radios could work
20	where it's at?		20	together or not, something along those lines?
21	Q.	Hmm-hmm, no, if you do know where it is.	21	A. Yes.
22	Α.	Well, you go get it.	22	Q. And why was it a violation of policy for
23	Q.	Okay, do you know	23	Scott Dunn to have that discussion with Chad Journell of
24	Α.	And when I mean, once you get it, I	24	the Pearisburg Police Department?
			1	

Pages 174..177

		Morgan Minn			
1	Α.	Page 17. Well, it is not that he had a discussion	4 1	Α.	Page 176 I'm going to say yes, because we haven't
2		's when he told them, if they get that radio	2	bought any ne	
3		are going to have to hire their own	3	Q.	Okay. Do you know if the Pearisburg Police
4	dispatchers.		4		timately purchased the radios that Mr. Dunn
5	Q.	And why was that a violation of policy?	5	had recommend	
6	Α.	Well, he was speaking for me.	6	Α.	I have no idea.
7	Q.	Okay.	7	Q.	All right, let's go to the next page, still
8	Α.	The sheriff.	8	_	issue, do you recall receiving this email
9	Q.	Now, are you saying that you believe that	9	from Jackie M	lartin?
10	Officer Dunn	was speaking as if he had your authority but	10	A.	Yes.
11	he didn't?		11	Q.	And is this about that radio?
12	A.	I don't know what he was speaking as.	12	A.	Hmm-hmm.
13	Q.	Okay.	13	Q.	Is that a yes?
14	A.	But he was speaking to them as a Board	14	A.	Yes, it is, yes, I'm sorry.
15	member, and h	e said that if they go with this type of	15	Q.	That is all right. And did you do you
16	radio, I don'	t know if it was Kenwood, Motorola, or	16	recall sendin	g that email back up top, "I just received
17	whatever, but	he did tell them, you know, if they did	17	your email, y	rou and I need to get together this morning."
18	that, they we	re going to have to hire their own	18	A.	Yes.
19	dispatchers,	and, you know, it's not up to us to tell then	19	Q.	And did you get together with him?
20	what they can	or cannot purchase.	20	A.	I think we did, yes.
21	Q.	Okay.	21	Q.	And was that over the phone or in person?
22	A.	And	22	A.	I think that we talked in person.
23	Q.	Okay, so this one paragraph here,	23	Q.	You talked about this event?
24	"Lieutenant	Scott Dunn, you are a member of the Giles	24	A.	We did.
		Page 17.	5		Page 177
1	County Board	of Supervisors and an employee of the Giles	1	Q.	Did you know about this conversation at all
2	County sherif	f's office. We've discussed this before,	2	until you had	been notified by Jackie Martin?
3	Lieutenant Du	nn, you are at no time to speak for me in the	: 3	A.	No.
4	capacity of a	Board of Supevisors member," so at what	4	Q.	So Chad Journell never notified you?
5	other times h	as there been an issue about this?	5	A.	No.
6	A.	I'm not sure.	6	Q.	Okay, the bottom, it says, before Jackie
7	Q.	Sitting here today, you can't recall any	7	signs his nam	me there, he says, "Don't come to my home
8	others?		8	asking for my	support in the upcoming election. You will
9	A.	No, I can't.	9	not get it.	He is killing you, Morgan, and you are
10	Q.	You don't recall the incident but do you	10	allowing it t	o continue." I guess that he is referring to
11	recall having	discussions with Mr. Dunn about this before, \ensuremath{A}	11	Scott Dunn?	
12	as it says so	in the letter?	12	A.	I think so.
13	Α.	I don't know. I know that we had a	13	Q.	Did you ever have any discussion with Mr.
14	discussion be	fore he decided to run for Board of	14	Martin about	why he would say that?
15	Supervisors.		15	A.	Well, it was evident.
16	Q.	Sure. What makes you think that Mr. Dunn	16	Q.	How so?
17		at this time to Chad Journell in his capacity	17	A.	They didn't like one another.
18	as a Board of	Supervisors member?	18	Q.	Martin and Dunn?
19	A.	Well, he told him, he said, you know, we're	: 19	A.	No.
1	buying a new	radio system, and you all will not be	20	Q.	Why?
20		ours. I forget now the correct terminology	21	A.	They just didn't.
20 21	compatible to				
21 22	compatible to that he used.		22	Q.	All right.
21		From your perspective, was Mr. Dunn being	22 23	Q. A.	All right. It was like oil or vinegar, or oil and

		1,1018411 1,1111110		on 04/07/2015 Pages 1/8181
1	Q.	Page 178 All right. So there have been some sparks	1	Page 180 need to be there?
2		tween these two before, is what you are	2	A. Do what.
3	saying?	ewedi diese ewo serore, is wike for the	3	Q. Nothing, just skip 15, please, and go to
4	A.	Yes.	4	16. Now, this is in April, April 6, 2009. Do you recall
5	Q.	Okay. Do you recall any particular issue	5	receiving this letter from lieutenant Thomas Gautier
6	_	brought up between the two of them before,	6	regarding Scott Dunn?
7		ios but some other issues?	7	A. I do, but would that have been Bo or
8	A.	There was something a year or so before; I	8	Carson?
9		omething about a radio system or something,	9	Q. It says Bo here.
10		xactly remember what it was.	10	A. Did we have Bo in 2009?
11	Q.	Okay.	11	Q. You can't ask him any questions, and if you
12	Α.	You would have to ask him about that.	12	don't know, that is the answer.
13	Q.	All right. So let's go let's go to Page	13	A. I don't know. I remember getting it, but I
14	_	going backwards in history here, so now	14	don't remember the dog's name.
15		h 15, 2013. Do you recall writing this?	15	Q. You have no reason to doubt the
16	A.	I do.	16	truthfulness of this document?
17	Q.	And did you write it on March 15, 2013?	17	A. No, but I remember the Slusher.
18	Α.	I think so.	18	Q. Sure.
19	0.	And earlier, you had mentioned an issue	19	THE WITNESS: Can we take a quick rest room
20	~	Dunn not getting his summonses in time?	20	break? Could we go off the Record for just a
21	A.	Yes.	21	minute?
22	Q.	And is this one of those, does that note or	22	MR. STRELKA: Yes.
23	letter refer		23	(A recess was taken.)
24	A.	This is one of those, yes.	24	BY MR. STRELKA:
1	0.	Page 179 And the bottom there, you say, "You are an	1	Page 181 Q. Are you ready?
2	~	uty and you represent our department well and	2	A. I am.
3	_	ent work." I'm assuming that on March 15,	3	MR. STRELKA: All right. I'd like this to
"			-	
4	_		4	_
4 5	2013, that is	a statement that you believed to be	4 5	be marked as Exhibit Number 28.
5	2013, that is truthful?	a statement that you believed to be	5	be marked as Exhibit Number 28.
5	2013, that is truthful?	a statement that you believed to be Yes.	5 6	be marked as Exhibit Number 28. (The above-mentioned document was marked as
5 6 7	2013, that is truthful? A. Q.	a statement that you believed to be Yes. At some point, though, is it fair to say	5 6 7	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the
5 6 7 8	2013, that is truthful? A. Q. that you felt	a statement that you believed to be Yes. At some point, though, is it fair to say that that statement was no longer true with	5 6 7 8	be marked as Exhibit Number 28. (The above-mentioned document was marked as
5 6 7 8 9	2013, that is truthful? A. Q. that you felt regard to Mr.	a statement that you believed to be Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn?	5 6 7 8 9	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.)
5 6 7 8 9	2013, that is truthful? A. Q. that you felt regard to Mr. A.	a statement that you believed to be Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right.	5 6 7 8 9	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA:
5 6 7 8 9 10	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q.	At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15,	5 6 7 8 9 10 11	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before?
5 6 7 8 9 10 11 12	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was	5 6 7 8 9 10 11	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have.
5 6 7 8 9 10 11 12 13	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay?	5 6 7 8 9 10 11 12 13	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at?
5 6 7 8 9 10 11 12 13 14	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other to doing his job	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good.	5 6 7 8 9 10 11 12 13 14	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and
5 6 7 8 9 10 11 12 13 14 15	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up	5 6 7 8 9 10 11 12 13 14 15	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for
5 6 7 8 9 10 11 12 13 14 15 16	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with	5 6 7 8 9 10 11 12 13 14 15 16	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound.
5 6 7 8 9 10 11 12 13 14 15 16 17	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right?	5 6 7 8 9 10 11 12 13 14 15 16 17	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound. Q. And is this for payment of Chastity
5 6 7 8 9 10 11 12 13 14 15 16 17 18	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes.	5 6 7 8 9 10 11 12 13 14 15 16 17 18	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound. Q. And is this for payment of Chastity Perkins; is that right?
5 6 7 8 9 10 11 12 13 14 15 16 17 18	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A. Q.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes. Have you ever written up anyone else for	5 6 7 8 9 10 11 12 13 14 15 16 17 18	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound. Q. And is this for payment of Chastity Perkins; is that right? A. Yes, huh-huh.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A. Q. this type of	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes. Have you ever written up anyone else for thing?	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound. Q. And is this for payment of Chastity Perkins; is that right? A. Yes, huh-huh. Q. Okay, and you see there looks to be a stamp
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A. Q. this type of A.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes. Have you ever written up anyone else for thing? I don't know.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the dog pound. Q. And is this for payment of Chastity Perkins; is that right? A. Yes, huh-huh. Q. Okay, and you see there looks to be a stamp in the middle of the page that appears to have your
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A. Q. this type of A. Q.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes. Have you ever written up anyone else for thing? I don't know. Okay. But you do recall writing this?	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	be marked as Exhibit Number 28. (The above-mentioned document was marked as Deposition Exhibit Number 28 and entered into the Deposition.) BY MR. STRELKA: Q. Have you ever seen this document before? A. I have. Q. What are you looking at? A. This is something from Dave Hunt and Greenbrier Contract Services for the employee payment for the dog pound. Q. And is this for payment of Chastity Perkins; is that right? A. Yes, huh-huh. Q. Okay, and you see there looks to be a stamp in the middle of the page that appears to have your signature in there?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	2013, that is truthful? A. Q. that you felt regard to Mr. A. Q. 2013, other t doing his job A. Q. is 14; this i summonses; is A. Q. this type of A.	Yes. At some point, though, is it fair to say that that statement was no longer true with Dunn? That is exactly right. Okay. But at this time, as of March 15, han this issue, would you say that he was okay? He was doing his job pretty good. Okay. Now we're jumping around. Next up s July 2, 2012. This is another issue with that right? Yes. Have you ever written up anyone else for thing? I don't know.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the dog pound. Q. And is this for payment of Chastity Perkins; is that right? A. Yes, huh-huh. Q. Okay, and you see there looks to be a stamp in the middle of the page that appears to have your

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1	that stamp or	Page 182		Page 184 (The above-mentioned document was marked as
2	Α.	This stamp here (indicating)?	2	Deposition Exhibit Number 29 and entered into the
3	Q.	Yes, sir.	3	Deposition.)
4	Α.	No, my secretary does that.	4	
5	Q.	Okay, so it is done at your office?	5	BY MR. STRELKA:
6	Α.	It is, and it is her signature above.	6	Q. All right. I will represent to you that I
7	Q.	Okay, and the other writing there, for	7	asked for, in the course of this case, an accounting of
8	_	100, what is Fund 100; what does that mean?	8	adoption fees received and related reimbursements
9	A.	I have no idea.	9	regarding the animal shelter, and this is what was
10	Q.	Is she writing this?	10	produced.
11	Α.	I guess that she is.	11	A. Okay.
12		Okay, what is her name?	12	•
	Q.			Q. Have you ever seen this before?
13	Α.	Kelly McCroskey.	13	A. No.
14	Q.	Okay, that is right, okay, and I will	14	Q. Do you know do you know who you've
15	-	you that we got a whole bunch of these	15	never seen this before, but do you know who produced this?
16	invoices		16	A. No, but I'm sure it's probably the
17	A.	You probably did.	17	treasurer's office.
18	Q.	okay, and I didn't want to print out a	18	Q. Okay.
19	bizillion inv	oices	19	MR. GUYNN: Well, if you don't know, how
20	A.	Thank you.	20	are you sure?
21	Q.	but I will represent to you that all of	21	THE WITNESS: Well, I don't know. I guess
22	the invoices	indicate that, do you see where it says next	22	that it is the treasurer's office.
23	to her name,	184 regular hours at the rate of \$9.06; do	23	MR. STRELKA: But you don't know?
24	you see that?		24	MR. GUYNN: Just out of curiosity.
		Page 183	-	Page 185
1	A.	Yes.	1	THE WITNESS: Okay.
2	Q.	And I will represent to you that all of the	2	BY MR. STRELKA:
3	ones that I'v	e seen say the exact same thing, 184 hours,	3	Q. So you are not in a position right now to
4	\$9.06?		4	be able to tell me what all of these numbers are?
5	A.	Okay.	5	A. No, I'm not.
6	Q.	Is that would you would you agree	6	Q. Okay. I know that you don't know for sure,
7	that that	is that your understanding of the invoices	7	okay, because you've never seen it, and I'm not holding
8	or		8	you to the knowledge that you do now
9	A.	It is.	9	A. Okay.
10	Q.	Okay.	10	Q but if I was going to go around asking,
11	70		111	
++	A.	I think that I think that they pay her	11	hey, man, what does this mean; what do these numbers mean,
12	\$7 point some	thing an hour, and Dave Hunt gets charged \$9	12	hey, man, what does this mean; what do these numbers mean, who would you think would be a good person to ask?
		thing an hour, and Dave Hunt gets charged \$9		
12	\$7 point some	thing an hour, and Dave Hunt gets charged \$9	12	who would you think would be a good person to ask?
12 13	\$7 point some and something	thing an hour, and Dave Hunt gets charged \$9 an hour.	12 13	who would you think would be a good person to ask? A. I would start with Rhonda Tickle.
12 13 14	\$7 point some and something Q.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay.	12 13 14	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title?
12 13 14 15	\$7 point some and something Q. A.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is	12 13 14 15	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she
12 13 14 15 16	\$7 point some and something Q. A. Q.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay.	12 13 14 15 16	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does.
12 13 14 15 16 17	\$7 point some and something Q. A. Q. A.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay. I don't know that to be true or not.	12 13 14 15 16 17	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does. Q. Okay, fair enough. All right.
12 13 14 15 16 17 18	\$7 point some and something Q. A. Q. A. Q. A.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay. I don't know that to be true or not. Right. Okay.	12 13 14 15 16 17 18	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does. Q. Okay, fair enough. All right. A. Are we finished with this one?
12 13 14 15 16 17 18 19	\$7 point some and something Q. A. Q. A. Q. A.	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay. I don't know that to be true or not. Right. Okay. I think that is I think that that is	12 13 14 15 16 17 18 19	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does. Q. Okay, fair enough. All right. A. Are we finished with this one? Q. Yes, sir. Also, while I'm at it, I was
12 13 14 15 16 17 18 19 20	\$7 point some and something Q. A. Q. A. Q. A. insurance and	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay. I don't know that to be true or not. Right. Okay. I think that is I think that that is things like that.	12 13 14 15 16 17 18 19 20	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does. Q. Okay, fair enough. All right. A. Are we finished with this one? Q. Yes, sir. Also, while I'm at it, I was given a big section of the County budget. Who would be
12 13 14 15 16 17 18 19 20 21	\$7 point some and something Q. A. Q. A. Q. A. insurance and	thing an hour, and Dave Hunt gets charged \$9 an hour. Okay. If that is Okay. I don't know that to be true or not. Right. Okay. I think that is I think that that is things like that. MR. STRELKA: Okay. All right. I would	12 13 14 15 16 17 18 19 20 21	who would you think would be a good person to ask? A. I would start with Rhonda Tickle. Q. What is her title? A. She is the County bookkeeper, and if she doesn't know, she can direct you to who does. Q. Okay, fair enough. All right. A. Are we finished with this one? Q. Yes, sir. Also, while I'm at it, I was given a big section of the County budget. Who would be the person to talk to if I wanted to

	_		
1	Page 186 that gave us all of the documents. We didn't have	1	Page 188 Q. I believe that they were incorporated into
2	it.	2	the Department of Agriculture's report, but did you have
3	THE WITNESS: I will give you her telephone	3	any discussion about those photos with anyone on the
4	number shortly.	4	Board?
5	BY MR. STRELKA:	5	A. I don't know; I don't think so. Maybe with
6	Q. And she works for the County?	6	Mr. McKlarney.
7	A. She does.	7	Q. Okay. Okay. I would like to show you a
8	MR. GUYNN: Yes.	8	document that was previously labeled as Exhibit Number 1
9	MR. STRELKA: Okay. All right. I'd like	9	in your deposition, okay?
10	this to be Exhibit Number 30.	10	A. Okay.
11	dis to be mainte named 50.	11	Q. Excuse me, Mr. Dunn's deposition; today is
12	(The above-mentioned document was marked as	12	your deposition. I'm sorry, I misspoke.
13	Deposition Exhibit Number 30 and entered into the	13	A. Okay.
14	Deposition.)	14	Q. Do you recognize that?
15	reposition.	15	A. I do.
16	BY MR. STRELKA:	16	
17	Q. Right, have you ever seen this before?	17	was altered by you that Mr. Dunn made?
18	A. No, sir.	18	A. Yes.
19	Q. This was not in place at the time that you	19	Q. Okay. And so that is the one that
20	were in the shelter, was it?	20	incorporates the comment regarding fantasy football?
21	A. I don't think so.	21	A. Yes.
22	Q. All right. Did you have at the time that	22	Q. Did you ever discuss any of the other
23	the sheriff's office managed the shelter a standard	23	matters contained within this report, and I'm not talking
24	operating procedure for the shelter?	24	about the fantasy football; I'm talking about the other
	Page 187		Page 189
1	A. No.	1	facts that are contained within this narrative with
2	Q. So this so there were no written	2	Officer Dunn?
3	procedures for the shelter prior to the County taking over	3	A. No.
4	the shelter?	4	Q. Okay.
5	A. No.	5	A. I don't think so.
6	MR. GUYNN: I think the answer is correct.	6	Q. Okay. All right. Let's look at what was
7	BY MR. STRELKA:	7	previously labeled, and I will take this one back because
8	Q. My understanding of your last answer	8	these were already entered, Exhibit Number 2.
9	MR. GUYNN: You said that there were no	9	A. Okay.
10	written procedures in place, and he said no.	10	Q. Do you recognize that?
11	MR. STREIKA: Meaning that there were?	11	A. This is the same thing, basically.
12	MR. GUYNN: I think that he means correct,	12	Q. Is that a could I see that. I have it
13	but you get a double negative when you read it.	13	right here.
14	BY MR. STRELKA:	14	A. Here is the IBR.
15	Q. My understanding was that let us do it	15	Q. Okay, let me see what I gave you. Sorry.
16	this way. Is this a truthful statement, okay, when the	16	I meant to give you Exhibit Number 3; that is what I meant
17	sheriff's office was managing the shelter, there was no	17	to do. Okay, here is just Exhibit Number 3. That is what
	operating procedure or manual in place?	18	I want to show you. I'm sorry about that.
18	A. Correct.	19	A. Okay.
19	Q. Okay. In the course of your job as	20	Q. Okay, so do you recognize this Exhibit
19 20		١.	
19 20 21	sheriff, when these issues in 2013 came up regarding the	21	Number 3?
19 20 21 22	animal shelter, were you ever presented or shown	22	A. I do.
19 20 21 22 23	animal shelter, were you ever presented or shown photographs of the animals at the shelter?	22 23	A. I do. Q. Okay, and if you go to the narrative, this
19 20 21 22	animal shelter, were you ever presented or shown	22	A. I do.

	Tuges 1701170				
1	with Mr Baile	Page 190 ey; is that right?	1	Page 192 "Investigated by Thwaites"?	
2	A.	Yes, that's right.	2	A. Yes.	
3	Q.	Okay. And now, on the second page of that,	3	Q. Is that accurate?	
4	-	"Narratives"?	4	A. Yes.	
5	A.	(Indicating).	5	Q. All right.	
6	0.	Right, right there at the bottom, usually	6	A. This is the one where Thwaites told Scott	
7	~	name of an individual who enters that	7	to get the warrant, I believe.	
8		re, right there on that page?	8	Q. Hmm-hmm, that's right; we were talking	
9	A.	I'm not sure.	9	about this earlier, that's right, and in Mr. Dunn's	
10	0.	Okay. Was there ever any indication that	10	deposition, he indicated at length that he was the one who	
11	~	written this narrative and you deleted that?	11	wrote the narrative that appears, the long narrative, that	
12	Α.	No, it wasn't because I deleted it.	12	appears all in capital letters?	
13	Q.	Okay. Did you ever make any changes to	13	A. Okay.	
14	this?	W.	14	Q. And do you ever remember having any	
15	Α.	No.	15	discussion with anyone about the fact that he wrote that?	
16	Q.	You didn't touch it?	16	A. No.	
17	Α.	No.	17	Q. Okay. Do you have any knowledge of why, if	
18	Q.	Okay. All right, so let's look at Page 3	18	he wrote that, why his name is not on this IBR?	
19	of that docum		19	A. I have no idea.	
20	A.	Okay.	20	Q. All right.	
21	Q.	Do you see at the bottom where it says	21	A. You know, sometimes my computer won't put	
22	"Narrative, 2	013," and spouts out a number?	22	my name on them, but that is probably user error.	
23	A.	Yes.	23	MR. STRELKA: All right. All right. I	
24	Q.	And then it says "Officer" and it gives a	24	only have just a few more questions. Let's go off	
		Page 191		D 101	
1		1 490 171		Page 193	
1	letter and so	me numbers and then it says "Boggess, M.C.,"	1	the Record for a second.	
1 2			1 2		
		me numbers and then it says "Boggess, M.C.,"		the Record for a second.	
2	and what does	me numbers and then it says "Boggess, M.C.," that information tell you on this document?	2	the Record for a second. (Discussion off the Record.)	
2 3	and what does	me numbers and then it says "Boggess, M.C.," that information tell you on this document?	2 3	the Record for a second. (Discussion off the Record.) (A recess was taken.)	
2 3 4	and what does A. was	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document	2 3 4	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA:	
2 3 4 5	and what does A. was Q.	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered	2 3 4 5	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5	
2 3 4 5 6	and what does A. was Q. A.	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered	2 3 4 5 6	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you	
2 3 4 5 6 7	and what does A. was Q. A. by Mason Bogge	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing?	2 3 4 5 6 7	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle?	
2 3 4 5 6 7 8	and what does A. was Q. A. by Mason Bogge	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically	2 3 4 5 6 7 8	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits	
2 3 4 5 6 7 8	and what does A. was Q. A. by Mason Bogge Q. been, in this	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing?	2 3 4 5 6 7 8	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office.	
2 3 4 5 6 7 8 9 10 11 12	and what does A. was Q. A. by Mason Bogge Q. been, in this A.	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the	2 3 4 5 6 7 8 9	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked	
2 3 4 5 6 7 8 9 10	and what does A. was Q. A. by Mason Bogge Q. been, in this A. Q.	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the	2 3 4 5 6 7 8 9 10 11	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked earlier about vehicles that were going to be surplused.	
2 3 4 5 6 7 8 9 10 11 12	and what does A. Was Q. A. by Mason Bogger Q. been, in this A. Q. individual wh	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the owrote this?	2 3 4 5 6 7 8 9 10 11 12	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked earlier about vehicles that were going to be surplused. Was that one of those vehicles?	
2 3 4 5 6 7 8 9 10 11 12 13	and what does A. was Q. A. by Mason Bogge Q. been, in this A. Q. individual when A. Q.	me numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the owrote this? You would think so.	2 3 4 5 6 7 8 9 10 11 12 13	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked earlier about vehicles that were going to be surplused. Was that one of those vehicles? A. No.	
2 3 4 5 6 7 8 9 10 11 12 13 14	and what does A. was Q. A. by Mason Bogge Q. been, in this A. Q. individual when A. Q.	The numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the ownote this? You would think so. And let's look at the first page of this	2 3 4 5 6 7 8 9 10 11 12 13 14	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked earlier about vehicles that were going to be surplused. Was that one of those vehicles? A. No. Q. Was it a completely separate vehicle?	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and what does A. Was Q. A. by Mason Bogge Q. been, in this A. Q. individual whe A. Q. Exhibit Number you see that? A. Q. end of it, it A. Q. accurate recons	The numbers and then it says "Boggess, M.C.," that information tell you on this document? It tells you that the following document The following information? Yes, the following information was entered ess. Okay. So wouldn't there have typically previous narrative, the same thing? You would think so. And a time stamp with a name of the owrote this? You would think so. And let's look at the first page of this and let's look at the first page of this and you see where it says, "Assignment;" do Yes. And you see in the first line there at the says, "Reported by Tickle." Yes. Is your understanding is that that is an and there, that that was reported by Tickle?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the Record for a second. (Discussion off the Record.) (A recess was taken.) BY MR. STRELKA: Q. I would like to show you Exhibit Number 5 that was entered at Scott Dunn's deposition. Do you recognize that vehicle? A. I think that that is the one that sits behind the sheriff's office. Q. Was that a vehicle that was we talked earlier about vehicles that were going to be surplused. Was that one of those vehicles? A. No. Q. Was it a completely separate vehicle? A. Yes. Q. And what does that vehicle what is the function of that vehicle now? A. Well, right now, today, it's at the school bus garage, the County garage, with no tags on it. It's going to be surplused. Q. Okay. Did you ever have any discussions with any Board members about the firing or terminating of	

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_				D 404
1		Page 194 MR. STRELKA: Before.	1	Page 196 WITNESS SIGNATURE PAGE
2		THE WITNESS: No.	2	I hereby certify that I have read my
3	BY MR. STRELK	A:	3	deposition, and made those changes and/or
4	Q.	You don't did you have any conversation	4	corrections I deem necessary, and approve the same
5	with Chris Mc	Klarney in which you indicated that you	5	as now written.
6	wanted to ter	minate Scott Dunn?	6	Executed this day of,
7	A.	No.	7	2015.
8	Q.	That never happened?	8	
9	Α.	No.	9	
10	Q.	Jay what is his name?	10	ву:
11	χ.	MR. DUNN: Williams.	11	
12	BY MR. STRELK		12	MORGAN MILLIRONS
13	0.	Did you ever talk to Jay Williams?	13	Witness
14	Α.	Yes, I talked to Jay, yes.	14	
15	Q.	And did you say that you wanted to	15	
16	terminate Sco		16	
17	Α.	No, I was I wanted it to work out.	17	
18	Q.	So your testimony is that prior to your	18	
19		erminate Scott Dunn, you never had any single	19	
20		with any member of the Board, including the	20	
21		strator, Chris McKlarney, about your	21	
22	-	terminate Scott Dunn?	22	
23	Α.	I know that I didn't with Chris McKlarney.	23	
24	Q.	But you are unsure of the other people?	24	
	χ.	Date for the distance of the control people.		
1	7	Page 195	1	Page 197
1	A.	I'm unsure about Jay Williams because Jay	2	COMMONWEALTH OF VIRGINIA
2		d to talk about every week, and I don't know	3	COUNTY OF ROANOKE
3	what we talke		4	I, Lisa M. Hooker, Notary Public in and for
4	Q.	What about Ms. Hobbs; did you ever talk to	5	the Commonwealth of Virginia, at Large, do hereby certify
5		minating Scott Dunn? I don't know.	6	that the Deposition of MORGAN MILLIRONS was by me reduced
6	Α.		7	to machine shorthand in the presence of the witness,
7	Q.	So it's possible you could have?	8	afterwards transcribed under my direction by means of
8	Α.	It's possible.	9	Computer, and that to the best of my ability the foregoing
9	Q.	All right.	10	is a true and correct transcript of the Deposition as
10	Α.	We talk about a lot of things.	11	aforesaid.
11	Q.	The last thing	12	I further certify that this Deposition was
12	A.	Jay did talk to me one time after I	13	taken at the time and place in the foregoing caption specified.
13	terminated ni	m. He asked me	15	I further certify that I am not a relative,
		MR. GUYNN: That wasn't the question.	16	counsel or attorney for either party or otherwise
14				
15		THE WITNESS: Okay.	17	interested in the outcome of this action.
15 16	5	MR. STRELKA: Hold on. I don't have any		
15 16 17		MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free	17	interested in the outcome of this action.
15 16 17 18	furth to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave.	17 18	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of
15 16 17 18 19	to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave. MR. GUYNN: Actually, I just have no, I	17 18 19	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of
15 16 17 18 19 20	to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave.	17 18 19 20	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of
15 16 17 18 19 20 21	to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave. MR. GUYNN: Actually, I just have no, I have any questions, either. We'll read.	17 18 19 20 21 22	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of April, 2015. Siam Morte RPR
15 16 17 18 19 20 21 22	to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave. MR. GUYNN: Actually, I just have no, I	17 18 19 20 21	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of April, 2015. Juan Hooker Notary Public
15 16 17 18 19 20 21	to le	MR. STRELKA: Hold on. I don't have any er questions. Thank you, sir, you are free ave. MR. GUYNN: Actually, I just have no, I have any questions, either. We'll read.	17 18 19 20 21 22	interested in the outcome of this action. IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 20th day of April, 2015. Lisa M. Hooker

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2	DEPOSITION OF: MORGAN MILLIRONS		
-	CASE: DUNN v. MILLIRONS		
3	DATE TAKEN: APRIL 7, 2015		
	REPORTER: LISA M. HOOKER, RPR		
4	REFOREM. HOURER, REK		
-	I have read the foregoing deposition and I wish to		
5	make the following changes:		
6			
7	PAGE LINE CHANGE REASON		
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9			
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11			
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14			
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18			
19			
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21			
22			
23	WITNESS NAME		
24			

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